

Minutes and Informal Instructions of the Open Meeting of
Thursday, November 6, 2008
Page 4

5780-109417 – Complaint Filed by Robert A. Schmidt Against Sturgeon Bay Municipal Electric Utility

Petition for Rehearing

The Commission did not grant the request filed on behalf of Robert A. Schmidt that it reconsider its denial of his request for formal Commission review.

The Commission directed the Division of Water, Compliance and Consumer Affairs to draft an order consistent with its discussion.

6720-TI-196 – Petition of SBC Wisconsin for Suspension of Wis. Stat. § 196.196(1) with Regard to Basic Local Exchange Service

Third Staff Annual Report on Partial Deregulation of AT&T's Basic Local Exchange Service

This item was laid over at the request of the Commission.

5-TN-100 – Investigation of Area Code Relief for the 715 Area Code in Northern Wisconsin

5-TN-106 – Investigation of Area Code Relief for the 920 Area Code

Consideration of Relief Alternatives

The Commission ordered an overlay as the method of area code relief for the 715 area code.

The Commission ordered an overlay as the method of area code relief for the 920 area code.

The Commission set parameters for customer education and the implementation of area code relief in the 715 and 920 area codes.

The Commission directed the Telecommunications Division to draft orders consistent with its discussion.

Sandra J. Paske
Secretary to the Commission

PUBLIC SERVICE COMMISSION OF WISCONSIN

Memorandum

September 28, 2007

FOR COMMISSION INFORMATION

RECEIVED
SEP 28 2007
Commissioners' Office

#17

11-6-08

TO: The Commission

FROM: Joyce M. Dingman, Assistant General Counsel *JMD*
Office of General Counsel

RE: Investigation of Area Code Relief for the 715 Area Code in
Northern Wisconsin

5-TN-100

(Summary Memo)

Hearings were held in the above referenced proceeding on September 17-21, 2007, in River Falls, Eau Claire, Wausau, Marinette, Rhinelander, Ashland, Hayward, Superior and Medford, Wisconsin. The record consists of transcript Volume 1 (pgs. 1-43), Volume 2 (pgs. 44-55), Volume 3 (pgs. 56-62), Volume 4 (pgs. 63-70), Volume 5 (pgs. 71-76), Volume 6 (pgs. 77-103), Volume 7 (pgs. 104-127), Volume 8 (pgs. 128-144), and Volume 9 (pgs. 145-164). The last transcript was distributed September 27, 2007. No briefs will be filed.

Participating staff include Kathy Bakke, Murugan Kollengode and Gary Evenson.

JMD:aff:x:\memo\2007\5-TN-100 Summary Memo

cc: SJP, JMD, KLB

I hereby certify that I have heard the case, read the record, or reviewed the record of this case under Wis. Stat. § 196.24(3).

Signed _____
Commissioner

Dated _____

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I hereby certify that I have had no communication with a party, party's representative or person who may have a substantial interest in the Commission's action in this proceeding that would be a communication prohibited by Wis. Stat. § 227.50 if made to an agency official involved in the decision in this matter.

Signed _____
Executive Assistant

Dated _____

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Signed *[Signature]* Commissioner

Dated 11/6/08

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Signed *Mark Meyer*
Commissioner

Dated 11/4/08

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[Signature]
Commissioner

Dated _____

1/23/08

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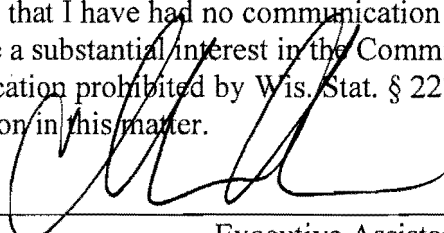
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Signed 
Executive Assistant

Dated 10/6/08

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Signed

La K Stefanski
Executive Assistant

Dated

10.21.08

PUBLIC SERVICE COMMISSION OF WISCONSIN

Memorandum

November 30, 2007

FOR COMMISSION INFORMATION

RECEIVED
NOV 30 2007
Commissioners' Office

17

11-6-08

TO: The Commission

FROM: Joyce Dingman, Assistant General Counsel *JMD/aff*
Office of General Counsel

RE: Investigation of Area Code Relief for the 920 Area Code

5-TN-106

(Summary Memo)

Hearings were held in the above-referenced proceeding on October 15-18, 2007, in Sheboygan, Sturgeon Bay, Green Bay, Appleton, Oshkosh, Fond du Lac and Watertown, Wisconsin. The record consists of transcript Volume 1 (pgs. 1-40), Volume 2 (pgs. 41-45), Volume 3 (pgs. 46-52), Volume 4 (pgs. 53-82), Volume 5 (pgs. 83-107), Volume 6 (pgs. 108-117), Volume 7 (pgs. 118-124), and Exhibits 1-3. The last transcript was distributed November 1, 2007. No briefs will be filed.

Participating staff include Kathy Bakke, Murugan Kollengode and Gary Evenson.

JMD:aff:x:\memo\2007\5-TN-106 Summary Memo

cc: SJP
JMD
KLB

I hereby certify that I have heard the case, read the record, or reviewed the record of this case under Wis. Stat. § 196.24(3).

Signed _____
Commissioner

Dated _____

PUBLIC SERVICE COMMISSION OF WISCONSIN

Memorandum

November 30, 2007

FOR COMMISSION INFORMATION

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FROM: Joyce Dingman, Assistant General Counsel
Office of General Counsel

RECEIVED
NOV 30 2007
Commissioners' Office

17
11-6-08

RE: Investigation of Area Code Relief for the 920 Area Code

5-TN-106

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Signed _____
Executive Assistant

Dated _____

PUBLIC SERVICE COMMISSION OF WISCONSIN

Memorandum

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Commissioners' Office

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TO: The Commission

FROM: Joyce Dingman, Assistant General Counsel *JMD/aff*
Office of General Counsel

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Signed

[Signature]

Commissioner

Dated

11/6/08

MVA

PUBLIC SERVICE COMMISSION OF WISCONSIN

Memorandum

November 30, 2007

RECEIVED

NOV 30 2007

17

FOR COMMISSION INFORMATION

Commissioners' Office

11-6-08

TO: The Commission

FROM: Joyce Dingman, Assistant General Counsel *JMD/off*
Office of General Counsel

RE: Investigation of Area Code Relief for the 920 Area Code 5-TN-106

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JMD
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Signed

Mark Meyer

Commissioner

Dated

11/6/08

241

PUBLIC SERVICE COMMISSION OF WISCONSIN

Memorandum

November 30, 2007

FOR COMMISSION INFORMATION

RECEIVED

NOV 30 2007

Commissioners' Office

#17

11-6-08

TO: The Commission

FROM: Joyce Dingman, Assistant General Counsel *JMD/aff*
Office of General Counsel

RE: Investigation of Area Code Relief for the 920 Area Code

5-TN-106

(Summary Memo)

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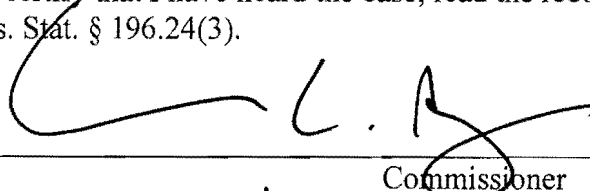
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Signed


Commissioner

Dated

11/23/08

(12)

PUBLIC SERVICE COMMISSION OF WISCONSIN

Memorandum

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Signed _____

Executive Assistant

Dated _____

11/6/08

HS

PUBLIC SERVICE COMMISSION OF WISCONSIN

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TO: The Commission

FROM: Joyce Dingman, Assistant General Counsel
Office of General Counsel

gmd/off

RE: Investigation of Area Code Relief for the 920 Area Code

5-TN-106

(Summary Memo)

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Signed

[Signature]
Executive Assistant

Dated

10.21.08

RECEIVED

OCT 24 2008

MSV

Commissioners' Office

PUBLIC SERVICE COMMISSION OF WISCONSIN



Memorandum

October 24, 2008

FOR COMMISSION AGENDA

#17

11-6-08

TO: The Commission

FROM: Gary A. Evenson, Administrator
Kathleen Bakke, Program & Policy Analyst
Telecommunications Division

HA E
RLB G

RE: Investigation of Area Code Relief for the 715 Area Code in Northern Wisconsin 5-TN-100

Investigation of Area Code Relief for the 920 Area Code 5-TN-106

Consideration of Relief Alternatives

Suggested Minute: The Commission ordered a (split/overlay) as the method of area code relief for the 715 area code.

If a split, the Commission designated alternative (2/3/4/5/6/other) as the split line between the two area codes and ordered that (Area A/Area B) should retain the 715 area code.

Suggested Minute: The Commission ordered a (split/overlay) as the method of area code relief for the 920 area code.

If a split, the Commission designated alternative (2/2 as modified 3/4/ other) as the split line between the two area codes and ordered that (Area A/Area B) should retain the 920 area code.

Suggested Minute: The Commission set parameters for the implementation of area code relief in the 715 and 920 area codes and directed staff to draft orders consistent with its discussions of implementation and customer education.

This memorandum discusses area code relief in general and presents for the Commission's consideration and determination the issues of selecting area code relief methods for the 715 and 920 area codes.

Introduction

These investigations were initiated to address the introduction of new area codes in the portions of Wisconsin currently served by the 715 and 920 area codes.¹ The most recent forecast indicates that the 715 area code will run out of assignable central office codes (or NXXs) in the first quarter of 2011, while the 920 area code is expected to exhaust in fourth quarter of 2011.² To ensure that an adequate supply of telephone numbers remains available for assignment, action must be taken in these areas to introduce another area code. Although the Federal Communications Commission (FCC) has primary jurisdiction over numbering issues in the United States, it has delegated the ability to select the method of area code relief to state commissions.

The two basic methods of area code relief are an overlay or a geographic split (split). These alternatives are discussed in detail below. The basic issues for the Commission to decide are whether an overlay or a geographic split is the best relief option for the 715 and 920 area codes and, if a split is chosen for either area, where the split line should be drawn and which side of that line should retain the existing area code. Finally, there are issues of area code relief implementation to address regardless of the method of relief that is ordered.

¹ Telephone numbers within an area code are a finite quantity. The telephone numbering system operates under the North American Numbering Plan (NANP). That plan, developed in 1947 by AT&T, and subsequently adopted by the FCC, established the 10-digit scheme used today. Telephone numbers consist of a 3-digit area code, a 3-digit central office code and a 4-digit line number. For example, for the telephone number (715) 555-9999, the area code is 715, the central office code is 555 and the line number is 9999. The 715 and 920 area codes have 792 assignable central office or “NXX” codes. Up to 10,000 line codes can be assigned from each NXX.

² When the investigation into area code relief for the 715 area code resumed in February 2007, the projected exhaust date was the fourth quarter of 2009. However, due to fewer than anticipated code assignments in 2007, as well as the return of several NXX codes, the April 2008 forecasts further extended the life of the 715 area code. There was a similar situation in the 920 relief proceeding. When the 920 relief petition was filed with the Commission in June 2007, the projected exhaust date was the second quarter of 2010. However, the combination of fewer code assignments in 2007 and the return of 22 NXX codes have further extended the life of the 920 area code.

Background

In recent years, the prevalence of telecommunications technologies in everyday life has increased tremendously. Many households no longer have a single phone number for the entire family. Instead, customers often have multiple telephone lines, multiple cell phones and Internet access. Business customers also have many telephone number needs. The combined effects of new technologies (i.e., OnStar, Voice over Internet Protocol), new telecommunications providers requiring their own telephone numbering inventories to serve customers and the increased demand for telecommunications services in general (such as cellular phones, pagers, fax machines, modems, alarms and internet access) have strained existing telephone number resources, both in Wisconsin and across the country. This rapid growth in demand for telephone numbers has resulted, in many places, in a condition known as area code “exhaust.” An area code reaches exhaust when all of the available NXX codes within that area code have been assigned.³ Area code relief, by means of an overlay or a geographic split, must then be implemented.

An **overlay** occurs when more than one area code serves the same geographic area. Relief is provided by introducing a new area code within the same geographic region as the area code that is exhausting. With an overlay, all current customers keep their area code and 7-digit telephone number. Eventually, in some locations, telephone numbers with the new area code will be assigned to new customers requesting service, as well as to existing customers ordering

³ In general, the North American Numbering Plan Administrator (NANPA) assigns telephone numbers to a telecommunications provider by NXX. As more NXX codes in the area code are assigned, the area code approaches exhaust, thus creating the need for relief. As of October 15, 2008, of the 792 NXX codes that were originally available for assignment, 87 remain available in the 715 area code and 102 remain available in the 920 area code.

additional lines. Because both area codes reside within the same geographic area, all local calls must be dialed using the area code and the 7-digit telephone number (10 digits).⁴ In addition:

- Overlays avoid the need for public and political involvement concerning split boundaries and determining which side of the split line should retain the old area code.
- An overlay will not require existing customers to change their area code. There is no need to revise stationery, business cards and advertising; unless these printed materials contain only 7-digit phone numbers.
- An overlay may require some customers to adjust their automatic dialers or call forwarding arrangements to incorporate the area code on all dialed calls.
- Calling areas and rates are not impacted by an overlay. Calls that were considered local before the introduction of the new area code will remain local calls. Calls that were considered long distance before the new area code will remain long distance calls.

If an overlay is selected, the new area code will be introduced in four steps. These steps allow for a network preparation period and are designed to guide consumers by familiarizing them with the new area code and the dialing changes that will be required with an overlay.

⁴ The FCC's rules, 47 C.F.R. § 52.19(c)(3)(ii), require 10-digit dialing when an overlay is implemented. This mitigates a dialing disparity between those customers assigned telephone numbers in the old area code and those assigned numbers in the new area code. The 10-digit dialing requirement also avoids disadvantaging newer providers (and their customers) and promotes the goal of having a numbering system that is competitively neutral.

1. **Network Preparation Period:** During the network preparation period, industry prepares the telecommunications network for the necessary modifications to accommodate the overlay and develops its customer education materials.
2. **10-Digit Permissive Dialing:** During a permissive 10-digit dialing period, customers are educated (through advertising, bill inserts, media sources and public announcements) about the upcoming changes are encouraged to begin using the current area code and the 7-digit number to place all local calls within the area code, although during the permissive period, these calls will still complete if a caller dials only the 7-digit number. During this transitional period, all impacted customer equipment such as life safety systems, alarms, PBX's, fax machine calling lists, speed dialers, private entry access systems, auto-dialers and dialing lists on personal computers should be reprogrammed.
3. **Mandatory 10-Digit Dialing:** Mandatory 10-digit dialing begins at the end of the formal permissive dialing period. Callers must use the area code and the 7-digit number for all local calls. Calls incorrectly dialed using only 7 digits will be transferred to a recording that will inform the calling party that it is necessary to dial the area code and the 7-digit telephone number to in order complete the call.
4. **Introduction of the New Area Code:** Numbers with the new overlay area code will start being introduced shortly after mandatory 10-digit dialing begins.

The second method of providing area code relief is a **geographic split**. With a split, the

geographic area served by an existing area code is split into two smaller areas.⁵ One of the sections retains the existing area code while the other section receives a new area code. Splits thus require an area code change for approximately one-half of the customers. Stationery, business cards, advertising and other written materials that include a telephone number would need to be revised by those customers receiving the new area code. Affected customers need to inform friends, relatives, vendors and others that call them that their area code has changed. In addition:

- Splits maintain a single area code for each geographic area. This may minimize confusion for callers from outside of the area.
- Geographic splits permit seven-digit local dialing within the area code.
- Though the area code for some customers is changed, there is no change to any customer's 7-digit telephone number.
- Calling areas and rates are not impacted by a split. Calls that were considered local before the introduction of the new area code will remain local calls. Calls that were considered long distance before the new area code will remain long distance calls.

If a split is selected, the new area code will be introduced in four steps. These steps allow for a network preparation period and are designed to guide consumers, familiarize them with the new area code and facilitate the correct use of the new area code:

⁵ A two-way split is the split considered herein. Although it is possible to do a three-way split (or more), thus delaying the need for future area code relief efforts in these areas, such action is not practical or favored for two reasons. First, it could arguably aggravate the confusion among the public by having two (or more) new area codes being introduced at the same time. Second, area codes themselves are a scarce numbering resource. Assigning more than one in a state, where it is not needed, could lead to a premature exhaust of area codes available in the North American Numbering Plan. Additionally, the forecasted demands for NXX codes in the 715 and 920 area codes do not warrant the need for a 3-way split.

1. **Network Preparation Period:** During the network preparation period, industry prepares the telecommunications network for the necessary modifications to accommodate the split and develops its customer education materials.
2. **Permissive Dialing:** During the permissive dialing period, callers can reach numbers in the area assigned the new area code, whether they dial the old area code or the new area code when placing calls. During this transitional period, customers are educated (through advertising, bill inserts, media sources and public announcements) about the upcoming changes and should make an effort to begin using the new area code. The permissive dialing period begins with the introduction of the new area code and generally lasts several months. This provides a ‘get acquainted’ transition period for the new area code. During this time, all impacted customer equipment such as life safety systems, alarms, PBX’s, fax machine calling lists, speed dialers, private entry access systems, auto-dialers and dialing lists on personal computers should be reprogrammed.
3. **Mandatory Dialing:** When permissive dialing ends, calls to customers in the new area code must be dialed using that new area code. When mandatory dialing goes into effect, an intercept recording period will begin. At that time, callers must use the appropriate area code for the geographic area they are calling.
4. **Recorded Announcement Period:** Once mandatory dialing begins, incorrectly dialed calls will be referred to a recorded announcement informing the calling party that the new area code must be used in order to complete the call. After the recording period ends, callers who do not use the correct area code may reach a “not in service” recording or a wrong number.

Perhaps the most common suggestion from the public facing the prospect of an area code change is to create an area code that is used only for wireless services, fax machines or other non-wireline, non-voice uses such as credit card verification. However, the FCC has indicated that this type of use for area codes is not permitted. The FCC restricts the ability of states from approving area code relief plans that exclude a particular type of telecommunications service from an area code or those relief plans that segregate services and/or technologies into different area codes. The FCC's decision sought to protect new telecommunications services from discrimination or disadvantage. For example, if a new area code were assigned only to cellular services, all local calls between a cellular customer and a wireline customer would require 10-digit dialing, while a wireline-to-wireline calls could be made by dialing 7 digits. Such a dialing disparity was found to favor wireline customers at the expense of cellular customers. Also, through local number portability, wireline numbers can be ported to a wireless service provider and vice versa. This co-mingling of numbers and technologies effectively prevents these services from being separated by area codes.

Although the Commission has historically chosen a split as the preferred method of area code relief in Wisconsin, it is not bound to do so in either of these cases.⁶ Either an overlay or a split is a valid option for 715 or 920. Across the nation, area code relief has been successfully implemented using both methods, although there is a growing trend across the country to implement overlays.⁷

⁶ In Wisconsin, the current 920 and 262 area codes were created (in 1997 and 1999 respectively) when the 414 area code was split on two previous occasions. In fact, the 608 area code was created by a split of the 715 and 414 area codes in 1955.

⁷ From 1995 to 2000, 111 new area codes were implemented across the nation. Of these, 21 (or 19%) of the decisions favored an overlay, while 90 (or 81%) of the decisions were for a split. From 2001 to 2007, there were 49 new area codes implemented. Of these, 27 (or 55%) of the decisions were for an overlay, while 22 (or 45%) of these decisions favored a split. Additionally, since July 2007, three states (Utah, West Virginia and California) have vacated their previous split decisions in favor of an overlay.

NeuStar, in its role as the North American Numbering Plan Administrator (NANPA), is responsible for assigning new NXX codes to telecommunications providers, for monitoring the usage of NXX codes within an area code and for forecasting when an area code will most likely exhaust and require relief. The NANPA notifies the appropriate state regulatory commission, as well as the telecommunications industry, three years in advance of when an area code is expected to run out of new NXX codes. The planning process begins with the NANPA and the telecommunications industry meeting to identify viable relief solutions. When developing and evaluating area code relief plans, the telecommunications industry is required to follow the regulations established by the FCC, state regulatory commissions, as well as established industry guidelines. Once all of the reasonable alternatives have been identified, industry representatives strive to reach consensus on the most efficient relief plan for the area as a whole. The proposed plan, along with industry's recommendation, is then submitted to the state regulatory commission for consideration.

715 Area Code Relief Efforts

The NANPA, in its role as a neutral third party administrator, and on behalf of Wisconsin's telecommunications industry (Industry), originally filed a petition for relief in the 715 area code on August 12, 2002. At that time, the 715 area code was expected to exhaust by the second quarter of 2005. However, conservation measures and more efficient mechanisms for allocating numbering resources were subsequently implemented, thus decreasing the demand for numbering resources in the 715 area code. Specifically, mandatory thousands-block number

pooling⁸ was implemented in 25 of the 253 rate centers located in the 715 area code on August 6, 2003. NeuStar, in its role as the national Pooling Administrator (PA), estimates that mandatory pooling has saved at least 67 central office codes in the 715 area code.⁹ The life gained through these pooling efforts allowed the original 715 area code relief efforts to be postponed until now.

On January 29, 2007, the NANPA notified the Commission that area code relief planning activities needed to resume for the 715 area code. At that time, NANPA anticipated that the 715 area code would run out of new NXXs by the fourth quarter of 2009. However, as noted above, more recent estimates indicate that the 715 area code is now expected to last until the first quarter of 2011.

The petition filed by NANPA reflected Industry's consensus decision¹⁰ to recommend an all-services overlay as its preferred method of relief in the 715 area code. In the event that Industry's overlay recommendation is rejected, the petition also includes five geographic split

⁸ Thousands-block pooling involves breaking up the 10,000 numbers in a central office code (NXX) into ten sequential blocks of 1,000 numbers. All of these numbers are assigned to a single rate center but can be allocated to multiple service providers in thousands-block increments.

⁹ Various number conservation efforts, including thousands-block number pooling, have proven to be valuable tools in achieving the postponement of relief planning, both in Wisconsin and across the nation. During the last year, Commission staff has attempted to expand industry participation in thousands-block number pooling by working with telecommunications providers on a case-by case basis to recover numbering resources that might otherwise have been stranded. Staff also contacted all providers with numbering resources in Wisconsin to solicit widespread voluntary donations to the number pool for all five area codes. Finally, the Commission petitioned the FCC for delegated authority to implement mandatory thousands-block number pooling in rate centers in which such action could possibly extend the life of the 715 and 920 area codes. The FCC granted Wisconsin's petition on August 24, 2007. On December 20, 2007, the Commission ordered all non-exempt providers in the 715 and 920 area codes to participate in mandatory thousands-block number pooling by May 1, 2008 (Implementation of Mandatory Thousands-Block Number Pooling in the 715 and 920 Area Codes in Wisconsin, Final Order, Docket 5-TN-109, Issued December 21, 2007). According to the PA, 764 thousand-number blocks (or the equivalent of 76 NXX codes) were recovered in the 715 area code from December 21, 2007 through July 31, 2008. During the same timeframe, 365 thousand-number blocks (or the equivalent of 36 NXX codes) were recovered in the 920 area code.

¹⁰ Though submitted as the Industry consensus plan, some individual telecommunications providers would prefer a split alternative, as stated in comments submitted herein.

alternatives for the Commission's consideration.¹¹ A detailed description of each alternative follows:¹²

Alternative #1: Overlay. This is Industry's recommended relief alternative because it would create a simple, uniform dialing plan throughout the 715 area code, thus reducing customer confusion and minimizing the impact of area code relief efforts on small business customers, as well as the tourism industry. An overlay would superimpose a new area code over the same geographic area covered by the existing 715 area code. All existing customers would retain the 715 area code and would not need to change their telephone numbers. Consistent with FCC regulations, this relief plan would require 10-digit dialing for all local calls made within and between the new area code.¹³ When the 715 area code exhausts, all NXX code assignments will be made from the new overlay area code. If an overlay relief plan is selected, Industry recommends a 19-month implementation schedule. This would allow for a 9-month network preparation and customer education period, followed by a 9-month permissive dialing period. The first NXX code assignment from the new area code would be made one month after the permissive dialing period ends. Alternative #1 has a projected life of 22 years.

Alternative # 2: Geographic Split. The proposed split boundary line for this alternative runs along rate center boundaries in a north to south direction and approximates the Local Access Transport Area (LATA) boundaries between LATA 352 and LATA 350. The proposed boundary runs west of Mercer, Brantwood, Medford, Greenwood and Pittsville and

¹¹ One of those alternatives, #6, is the Industry split preference if the Commission declines to order an overlay for the 715 area code.

¹² Industry's petition included detailed maps illustrating the proposed relief alternatives. These maps are attached to this memo.

¹³ 47 C.F.R. § 52.19(c)(3)(ii).

creates two new areas. The western area is referred to as “Area A” and the eastern area is referred to as “Area B.” Area A has a projected life of 21 years to exhaust, while Area B has a projected life of 23 years to exhaust. Industry reached consensus to eliminate Alternative #2 from consideration, as this alternative splits several end-office switch host-remote arrangements, placing some burden on service providers.

Alternative # 3: Geographic Split. The proposed split boundary line for this alternative runs along rate center boundaries in a west to east direction south of the Danbury, Spooner and Winter rate centers. The line then turns south and runs west of the Keenan, Medford, Owen, Greenwood and Pittsville rate centers, creating two new areas. The smaller, southwestern area is referred to as “Area B,” and the remainder is referred to as “Area A.” Area A has a projected life of 14 years to exhaust, while Area B has a projected life of 34 years to exhaust.¹⁴ Industry reached consensus to eliminate Alternative #3 from consideration, as this alternative separates certain dialing plans and the host-remote arrangements between the tandems in Rice Lake and Eau Claire. Additionally, it was noted by Industry that the two areas created by Alternative #3 have disproportionate population levels.

Alternative # 4: Geographic Split. The proposed split boundary line for this alternative runs along rate center boundaries in a west to east direction south of the Star Prairie, Clear Lake, New Auburn, Eagle Point and Stetsonsville rate centers. The line then turns south and runs west of the Edgar, Mosinee, Elderon and Waupaca rate centers, creating two new areas. The smaller, southwestern area is referred to as “Area B,” and the remainder is

¹⁴ A split that produces expected lives for the two area codes that differ by more than 10 years is not favored. See ATIS-0300061, Alliance for Telecommunications Industry Solutions (ATIS), Industry Numbering Committee (INC) NPA Code Relief Planning and Notification Guidelines, Section 5.0, November 9, 2007.

referred to as “Area A.” Area A has a projected life of 17 years to exhaust, while Area B has a projected life of 27 years to exhaust. Industry reached consensus to eliminate Alternative #4 from consideration, as this alternative splits several end-office switch host-remote arrangements.

Alternative # 5: Geographic Split. The proposed split boundary line for this alternative runs along rate center boundaries in a west to east direction south of the Star Prairie, Clear Lake, Mosinee and Marion rate centers, creating two new areas. The smaller, southern area is referred to as “Area B,” and the remainder is referred to as “Area A.” Area A has a projected life of 19 years to exhaust, while Area B has a projected life of 25 years to exhaust. Industry reached consensus to eliminate Alternative #5 from its consideration, as this alternative separates several switch host-remote central office and tandem arrangements for several service providers. This alternative also impacts dialing patterns in some areas, separates some communities of interest and impacts some ECC calling plans.

Alternative # 6: Geographic Split. As its second choice, Industry reached consensus to recommend Alternative #6, a geographic split, should the Commission reject an overlay relief plan. This option was selected because it approximates existing LATA boundary lines and is considered by Industry to be the least disruptive of all split plans considered in this proceeding. The proposed split boundary line for this alternative runs along rate center boundaries in a north to south direction west of Land of Lakes and curves north of Minocqua and Lac Du Flambeau and then turns south and runs west of Tomahawk and north of Rib Lake, creating two new areas. The western area is referred to as “Area A” and the eastern portion is referred to as “Area B.” Area A has a projected life of 19 years to exhaust, while Area B has a projected life of 24 years to exhaust.

Although Industry has made its primary and secondary recommendations, and has submitted alternate proposals for consideration, the Commission is under no obligation to select any of these specific relief alternatives.

715 Public Comments

Commission staff has worked extensively to inform the public of the pending relief efforts in the 715 area code, to educate the public about the potential relief alternatives and to solicit both public and Industry comments in this proceeding.

Commission staff, accompanied by Wisconsin's area code relief planner from NANPA, conducted nine public hearings throughout the 715 area code during the week of September 17, 2007.¹⁵ Seventeen consumers attended 7 of the hearings, media personnel attended 6 of the hearings and Industry representatives attended all of the hearings. In addition to the input received at these hearings, 194 comments were filed directly with the Commission.¹⁶ Of these comments, approximately 63 percent of the respondents favored a split, 32 percent favored an overlay, 3 percent had no preference, while 2 percent suggested that the Commission consider a wireless overlay.¹⁷

Of those parties favoring a geographic split, most felt that a split would minimize customer confusion, especially for senior citizens, young children and those speaking English as

¹⁵ Public hearings were held in River Falls and Eau Claire on September 17th, in Wausau and Marinette on September 18th, in Rhinelander and Ashland on September 19th, in Hayward and Superior on September 20th and in Medford on September 21, 2007.

¹⁶ These filings include public, Industry and Legislative comments. A summary of the comments is attached.

¹⁷ As previously stated, FCC rules do not favor the implementation of area code relief plans that exclude a particular type of telecommunications service from an area code or those plans that segregate services and/or technologies into different area codes. Therefore, a wireless overlay is not a viable option for relief in the 715 area code.

a second language. Many felt that the benefits of maintaining 7-digit dialing, as well as maintaining a unique geographic identity, far outweighed the short-term inconvenience and expense that some customers will experience when their area code changes. Most felt that this alternative would involve a minimal adjustment period compared to the long-term consequences of 10-digit dialing and the confusion that may result from two area codes operating simultaneously within the same geographic area.

Most respondents that supported a split did not express a preference about where the split line should be drawn, or which area should maintain the 715 area code. However, of those individuals that did express an opinion, 4 people preferred split Alternative #2, 1 person preferred Alternative #3 and 3 people preferred Alternative #6. Thirteen people felt that the western half of the state should retain the 715 area code due to its proximity to (and established business relationships with) the Twin Cities metropolitan area, while 6 felt that the eastern side of the state should retain the 715 area code.

Three individuals supporting a split alternative suggested that the Commission consider implementing a three-way split throughout the 715 area code to greatly expand the projected lives of each area. As previously noted (see footnote 5), just as there are a finite number of NXX codes within each area code, there are a finite number of area codes available in the NANP. Current projections suggest that the NANP may run out of assignable area codes by the mid 2030's. Therefore, new area codes are not assigned unless a current need for that code exists. Three other individuals suggested that the Commission consider using major highway corridors, such as I-94 or US Highway 29, or county lines as potential area code boundary lines.

However, established relief planning guidelines require area code boundaries to follow rate center boundaries, thus eliminating these suggestions from consideration.¹⁸

Of those parties who preferred an overlay, most felt that this alternative would minimize the financial impacts on local businesses.¹⁹ Many respondents also felt it was unfair to force approximately half of existing customers in the 715 area code to experience the hardship and inconvenience of changing their area code simply to maintain 7-digit local dialing, especially in light of the widespread use of wireless services and unlimited long distance calling plans that already utilize a 10-digit dialing scheme. Others pointed out that 10-digit dialing is probably inevitable and that Wisconsin should make this transition now.

Of the 194 comments filed directly with the Commission, 9 comments were filed by telecommunications providers. Of these comments, 2 providers supported a split alternative, while 7 providers supported an overlay.²⁰ The providers favoring a geographic split cited the following reasons:

- A split maintains 7-digit dialing for local calls made within the area code. The 10-digit dialing requirement with an overlay takes away from the “ease of use” valued by customers.
- A split maintains an area code’s unique geographic identity, which is also valued by customers.

¹⁸ See ATIS-0300061, Alliance for Telecommunications Industry Solutions (ATIS), Industry Numbering Committee (INC) NPA Code Relief Planning and Notification Guidelines, Section 2.11, November 9, 2007.

¹⁹ Although the business customers supporting an overlay frequently cited the potential financial hardships associated with a split (i.e., costs to change to advertising, signage and paper products, as well as the potential for lost business), most did not quantify these costs.

²⁰ Amery Telecom and Lakeland Communications would prefer a geographic split to provide relief in the 715 area code. Powercom, T-Mobile, AT&T, Level 3 Communications, Alltel, TDS, and Verizon support the Industry’s recommendation for an overlay.

The 7 providers that support Industry's recommendation for an overlay cited the following reasons:

- An overlay is significantly less expensive to implement, for consumers and Industry alike.
- Implementation of an overlay can be accomplished on a much shorter timetable, if necessary, ensuring that numbering resources are available to all service providers when needed.²¹
- Overlays eliminate the potential financial hardship on those commercial customers who would be forced to change their area code if a split alternative were chosen.
- An overlay does not create perceived "winners" and "losers," as all customers are treated equally and are allowed to retain their 10-digit telephone numbers.
- Overlays allow for a more efficient use of numbering resources within the area code, as NXXs from the new area code are available for assignment where demand exists.
- Overlays do not divide communities of interest.
- Experience with overlays implemented across the country has shown that customers easily adapt to 10-digit dialing. Once customers have made this adjustment, future relief efforts (if necessary) would be virtually seamless (by using further overlays).
- Overlays represent a progressive approach to introducing additional numbering resources and are fast becoming the preferred method of area code relief adopted by state commissions across the country.
- Overlays can minimize the technical difficulties often associated with local number

²¹ Industry has recommended a 19-month implementation period if an overlay is chosen. However, the comments filed by both AT&T and Verizon suggest that an overlay can be successfully implemented in as little as 15 months.

- portability (LNP) requirements when a split is implemented.
- With two Wisconsin area codes (715 and 920) projected to exhaust within nine months of each other, splits occurring concurrently in these area codes could present significant challenges to Industry and unnecessary confusion for consumers and business alike.
- With an overlay, wireless customers with older phones that cannot be programmed “over the air” will not be required to manually re-program their phones (this re-programming may be needed in a split scenario as some wireless phones would need to be manually adjusted to reflect the new area code).

Of the comments filed directly with the Commission, 3 letters were sent by legislators. State Senators Harsdorf and Jauch, and State Representatives Rhodes, Gronemus, Hraychuck, Murtha, Moulton and Hubler wrote to express their strong support for a geographic split (Alternative #6) that maintains the 715 area code in the northwestern portion of Wisconsin. The legislators explained that due to the proximity to the Twin Cities, millions of people and businesses in Minnesota would be negatively impacted by any area code changes implemented in western Wisconsin. Further, they note there is a strong economic link between the Twin Cities and western Wisconsin, as well as between Duluth and Superior. These legislators pointed out that the projected exhaust date for Area A is 19 years, while the projected exhaust date for Area B is 24 years. Because the residents living in Area A may be faced with another relief effort sooner than those residents living in Area B, it is appropriate for Area A to maintain the 715 area code.

State Senator Lassa, and State Representatives Vruwink, Molepske, Jr. and Schneider also expressed their support for a split, although they felt that the opposite side of the split line should retain the 715 area code. These legislators expressed support for Alternative #2

(with Area B retaining the 715 area code), Alternative 3 (with Area A retaining the 715 area code) or Alternative #6 (with Area B retaining the 715 area code). They noted that the northwestern region of Wisconsin is growing at an alarming rate and that commuting to the Twin Cities for work-related purposes has become commonplace. From a projected growth perspective, these legislators felt that the northwestern side of the state should receive the new area code. These legislators pointed out that there are several large businesses located in Central Wisconsin that would be negatively impacted by an area code change. In addition, this part of the state is home to a growing population of residents who speak English as their second language as well as the largest per-capita Senior Care enrollment. The legislators felt an area code change would cause undo confusion for this particularly vulnerable segment of the population.

Senator Breske's comments did not support a specific Industry alternative; however, he expressed strong support for the Northwoods area retaining the 715 area code.²² He cited the difficulties that an area code change would cause for large businesses and tourist attractions located in this part of the state, as well as the confusion that low-income residents and senior citizens would experience. Senator Breske also expressed his support for a wireless overlay.

Of the 194 comments filed directly with the Commission, 1 was filed by an energy utility, We Energies. We Energies expressed its support for an overlay in both the 715 and 920 area codes, as it would be less costly for the utility to implement this method of relief. Staff learned that many energy and water utilities across the state use automatic meter readers (AMR) or other monitoring devices that transmit data over telephone lines or Digital Communications Devices. Because telephone calls are a part of some AMR processes, an area code change could

²² Senator Breske's district covers a large part of northeastern Wisconsin.

impact these systems. In these situations, the area code relief option that is selected in both the 715 and 920 areas may have a direct impact on these metering/monitoring activities. To learn more about the impacts of area code relief on Wisconsin's energy and water utilities, staff sent an inquiry to Madison Gas & Electric (MG&E), Alliant Energy, We Energies, Xcel Energy and Wisconsin Public Service Corporation (WPSC), all other natural gas providers in Wisconsin, as well as the members of three utility organizations: the Municipal Electric Utilities of Wisconsin (MEUW), the Wisconsin Rural Water Association (WRWA) and the Wisconsin Water Association (WWA). Six utilities responded to staff's inquiry,²³ each of which has AMR and/or monitoring equipment that could be impacted by the Commission's area code relief efforts. All of the utilities indicated that it would be easier and less expensive if their area code was not changed. Two utilities specifically stated their preference for an overlay, while all respondents expressed their desire to retain their area code. The estimated cost to implement relief (if re-programming is necessary) appears to be largely dependent on the size of the utility and its specific service areas. Estimated costs ranged from a few thousand dollars to \$95,000.

920 Area Code Relief Efforts

The NANPA, in its role as a neutral third party administrator, and on behalf of Wisconsin's telecommunications industry (Industry), filed a petition for relief in the 920 area code on June 19, 2007. At that time, the 920 area code was expected to exhaust by the second quarter of 2010. However, more recent forecasts indicate that the 920 area code will not exhaust until the fourth quarter of 2011.

The petition filed by NANPA reflected Industry's consensus decision to recommend an

²³ St. Croix Gas, the City of Ashland, Superior Water Power & Light, WPSC, the City of Kaukauna and Xcel Energy responded to staff's October 2007 inquiry.

all-services overlay as its preferred method of relief in the 920 area code. In the event that Industry's overlay recommendation is rejected, the petition also includes three geographic split alternatives for the Commission's consideration. A detailed description of each alternative follows:²⁴

Alternative #1: Overlay. Industry recommended this alternative because it believes that an overlay the most expedient method of relief²⁵ and it eliminates the need for determining the location of a split boundary line and which area should retain the 920 area code. Industry also opined that an overlay would reduce customer confusion and minimize the financial impact of area code relief efforts on small business customers. An overlay would superimpose a new area code over the same geographic area covered by the existing 920 area code. All existing customers would retain the 920 area code and would not need to change their telephone numbers. Consistent with FCC regulations, the relief plan would require 10-digit dialing for all local calls within and between the new area code.²⁶ When the 920 area code exhausts, all NXX code assignments will be made from the new overlay area code. Alternative #1 has a projected life of 24 years.

Alternative #2: Geographic Split. As its second choice should the Commission reject an overlay relief plan for the 920 area code, Industry reached consensus to recommend Alternative #2, a geographic split. The proposed split line for this alternative runs along the 350 and 356 LATA boundary line in an east-to-west and southwest direction just south of Lake Winnebago. The split line starts between the Kewaunee and Tisch Mills rate centers

²⁴ Industry petition included detailed maps illustrating the proposed relief alternatives. These maps are attached to this memo.

²⁵ Comments filed by AT&T and Verizon suggest that a 920 overlay could be implemented in as little as 15 months.

²⁶ 47 C.F.R. § 52.19(c)(3)(ii).

and continues between the Tisch Mills and Denmark rate centers, then along the northern sides of the Whitelaw, Reedsville and Brillion rate centers, between the Sherwood and Hilbert rate centers, between the Stockbridge and Chilton rate centers, along the western side of the Chilton and Johnsburg rate centers, and then follows the southern portion of Lake Winnebago along the northern side of the Fond du Lac and Pickett rate centers, along the southern side of the Ripon, Green Lake and Princeton rate centers to the edge of the area code. The proposed split line creates two geographic areas. The northern area is referred to as “Area A” and the southern area is referred to as “Area B.” Area A has a projected life of 20 years to exhaust, while Area B has a projected life of 30 years to exhaust.

Alternative # 3: Geographic Split. The proposed split boundary line for this alternative runs along rate center boundaries in a north to south direction starting between the Pulaski and Seymour rate centers, continuing along the eastern side of the Seymour rate center, along the eastern side of the Little Chute, Kaukauna and Appleton rate centers, along the eastern shore of Lake Winnebago following the western sides of the Sherwood, Stockbridge, Chilton and Johnsburg rate centers, between the Mount Calvary and Fond du Lac rate centers, and then south on the western side of the Greenbush and Cascade rate centers to the edge of the area code, creating two new areas. The western Area is referred to as “Area A” and the eastern area is referred to as “Area B.” Area A has a projected life of 20 years to exhaust, while Area B has a projected life of 29 years to exhaust. Industry reached consensus to eliminate Alternative #3 from consideration, as the split boundaries do not follow LATA boundaries, thereby dividing local calling areas and making consumer education more difficult.

Alternative # 4: Geographic Split. The proposed split boundary line for this alternative runs along rate center boundaries in a north to south direction starting along the western and southern sides of the Seymour rate center, continuing along the eastern edge of the Little Chute, Kaukauna and Sherwood rate centers, turning in a southerly direction around the Sherwood rate center, around the western shore of Lake Winnebago, along the southern sides of the Oshkosh, Pickett and Ripon rate centers, along the western side of the Brandon rate center, then along the southern side of the Waupun, Oakfield and Lomira rate centers to the edge of the area code, creating two new areas. The western area is referred to as “Area A” and the eastern portion is referred to as “Area B.” Area A has a projected life of 28 years to exhaust, while Area B has a projected life of 22 years to exhaust. Industry reached consensus to eliminate Alternative #3 from consideration, as the split boundaries do not follow LATA boundaries, thereby dividing local calling areas and making consumer education more difficult.

Although Industry has made its primary and secondary recommendations, and has submitted alternate proposals for consideration, the Commission is under no obligation to select any of these specific relief alternatives.

920 Public Comments

Commission staff has worked to inform the public of the pending relief efforts in the 920 area code, to educate the public about the potential relief alternatives and to solicit both public and Industry comments in this proceeding.

Commission staff, accompanied by Wisconsin’s area code relief planner from NANPA, conducted seven public hearings throughout the 920 area code during the week of

October 15, 2007.²⁷ Twenty-one consumers attended 6 of the hearings, media personnel attended 2 of the hearings and Industry representatives attended all of the hearings. In addition to the input received at these hearings, 55 comments regarding the 920 area code were filed directly with the Commission.²⁸ Of the comments received, approximately 55 percent of the respondents favored a split, 27 percent favored an overlay, 9 percent had no preference while 9 percent suggested that the Commission consider a wireless overlay.²⁹

Of those parties favoring a geographic split, most felt that a split would minimize customer confusion, especially for senior citizens and young children. Many felt that the benefits of maintaining 7-digit dialing, as well as maintaining a unique geographic identity, far outweighed the short-term inconvenience and expense that some customers will experience when their area code changes. Most felt that this alternative would involve a minimal adjustment period compared to the long-term consequences of 10-digit dialing and the confusion that may result from two area codes operating simultaneously within the same geographic area. Others pointed out that the 414/920 split (that required customers residing in the newly created 920 area to change their area code) went relatively smoothly and there is no reason to believe that the current relief effort would not be handled in the same manner.

Most respondents that supported a split did not express a preference about the way the split line should be drawn, or which area should maintain the 920 area code. However, of those individuals that did express an opinion, 3 preferred split Alternative #2, and 1 person preferred

²⁷ Public hearings were held in Sheboygan on October 15th, in Sturgeon Bay and Green Bay on October 16th, in Appleton and Oshkosh on October 17th and in Fond du Lac and Watertown on October 18th.

²⁸ These filings include the public and Industry comments. A summary of these comments is attached.

²⁹ As previously stated, FCC rules do not favor the implementation area code relief plans that exclude a particular type of telecommunications service from an area code or those relief plans that segregate services and/or technologies into different area codes. Therefore, a wireless overlay is not a viable option for relief in the 920 area code.

split Alternative #3. Three individuals commented that the area commonly referred to as the Fox Valley should retain the 920 area code, while another person felt that Door County should retain the 920 area code in the interest of tourism.

Five individuals suggested that the Commission consider implementing a three-way split throughout the 920 area code to greatly expand the projected lives of each area.³⁰

One individual suggested that if a split is selected, the Commission should ensure that the Pickett and Oshkosh exchanges are kept on the same side of the split line.³¹ Pickett, an exchange of CenturyTel, has EAS with only one exchange—Oshkosh. If these exchanges are in different area codes, then even though calls are local, callers would need to dial the area code because the area codes differ. In split alternative #2 submitted by the Industry, Pickett and Oshkosh are split between area codes. This is likely because these two exchanges are today split between LATAs. Although doing area code splits along LATA lines is frequently considered, the request to keep these two EAS-connected exchanges on the same side of an area code split line is feasible.

Of those parties who preferred an overlay, most felt that this alternative would minimize the financial impacts on local businesses. Many respondents also felt it was unfair to force approximately half of the residents in the 920 area code to experience the hardship and inconvenience of changing their area code a second time simply to maintain 7-digit local dialing, especially in light of the widespread use of wireless services and unlimited long distance calling plans that already utilize a 10-digit dialing scheme. Others pointed out that it was unfair to ask

³⁰ As previously noted, area codes are becoming a scarce numbering resource and are not assigned to states needlessly.

³¹ This alteration of the area code boundary would not significantly change the expected life of either of the area codes (920 or the new area code) after the relief is implemented.

anyone in the 920 area code to change their numbers so soon after the last relief effort in that area (1997).

Of the 55 comments filed directly with the Commission, 7 comments were filed by telecommunications providers in support of Industry's recommendation to implement an overlay in the 920 area code.³² Although none of the providers favored a split, both AT&T and TDS expressed support for Alternative #2 should the Commission decide to split the 920 area code. However, TDS asked that the Commission make a slight modification to the proposed boundary line for Alternative #2. TDS asked that both its Stockbridge and Sherwood exchanges be included in Area B (the southern area in Alternative #2) to eliminate the need for 10-digit calling for EAS and ECC calls made to and from these exchanges and to keep all 4 exchanges of the Stockbridge and Sherwood Telephone Company in the same area.³³

Split Issue - Which Side of the Line Gets the New Area Code

If the Commission decides to split the 715 and/or 920 area code, it must address which side of the split line will retain the current area code and correspondingly, which side gets the new area code. There are no firmly established rules to govern how this decision is made. In some instances, the location of major commercial or industrial centers, or the potential impact on access to government services or military interests have been important factors in the decision-making process. In other instances, rural areas have been assigned the new area code in order to maintain the current area code in the more densely populated urban areas. Commonly, there is also consideration given to which area will have the shortest projected life after the area

³² Industry's reasons for supporting an overlay relief plan in the 920 area code mirror the reasons already itemized in the 715 Area Code Relief Efforts section of this memorandum. See pages 16-17.

³³ This alteration of the area code boundary would not significantly change the expected life of either of the area codes (920 or the new area code) after the relief is implemented.

code change. The area with the shortest projected life is often allowed to retain the current area code, as it will most likely be faced with additional area code relief measures sooner than the area with the longer projected life.

Implementation Considerations

NANPA has indicated that the nearly coincidental exhaust of two adjacent area codes is unique to Wisconsin. The 715 and 920 area code boundaries are contiguous for a few hundred miles from Coloma to Peshtigo. The geographic and temporal proximity of these areas, as well as the customer education efforts and the potential for dual permissive dialing periods may create some special concerns or technical issues related to the implementation of the new area codes. In light of these concerns, staff sent a data request to Wisconsin's telecommunications providers on May 16, 2008, asking for input on several possible relief scenarios. Six providers responded to staff's request for information,³⁴ and each one maintained their support for an overlay as the easiest and least disruptive method of relief for both area codes. A wide variety of reasons were cited to support industry's preference, including consumer issues (the ease of customer education, perceived fairness, cost, etc) and the potential network problems associated with a split, especially for those customers with wireless service and for those who may have ported their telephone number to a new provider. All of the respondents expressed their desire to know the Commission's decision on the 715 and 920 relief options as soon as possible and that there be no overlap between the relief projects for these area codes.³⁵ Industry cited a variety of potential problems if an overlap in relief efforts were to occur, including: unnecessary customer

³⁴ AT&T, Verizon, Verizon Wireless, CenturyTel, T-Mobile and Sprint responded to staff's data request.

³⁵ AT&T recommended that one area code relief project be completed with at least a 4-month interval between the end of the first area code relief project and the start of the second. This schedule would minimize customer confusion and allow enough time for AT&T to complete its translations, billing and network engineering work. On the other hand, CenturyTel recommended a 12-month interval between relief projects.

confusion, internal workforce planning concerns and potential implementation problems associated with intermodal local number portability.

Whichever relief method is selected for the 715 and 920 area codes, there will be a significant adjustment period for customers in these areas. If an overlay is selected for either area code, customers will need to dial the appropriate area code when making all local calls (10-digit dialing). However, all customers will maintain their current 10-digit telephone number, thereby minimizing the potential costs for commercial customers to update their paper products (letterhead, business cards, brochures, etc.), signage and advertising. On the other hand, if a split is selected for either the 715 or 920 area code, all customers will maintain 7-digit dialing for most of their local calls. However, approximately 50 percent of the customers will be required to change their area code. This will cause inconvenience for all impacted customers who will need to notify their personal and business contacts of their new area code. In addition, businesses will have the potential expense of changing their paper products, signage and advertising, as well as notifying their existing customers and vendors of the area code change.

Experience with other relief planning efforts around the country has shown that allowing adequate time for Industry's network preparation and consumer education makes the implementation of any relief alternative easier. If the Commission decides to overlay either the 715 and/or the 920 area codes, it has the opportunity to establish the timing intervals associated with Industry's network planning and customer education period, the (10-digit) permissive dialing period and the introduction of NXX codes from the new area code.³⁶ In general, overlay relief plans should allow at least 6 to 9 months for network preparation and customer education and at least 6 to 9 months for permissive dialing. If an overlay is the Commission's preferred

³⁶ A description of these activities begins on page 4 of this memorandum.

method of relief in the 715 and/or 920 area codes, Industry has recommended a 19-month implementation period. This recommendation consists of a 9-month network planning period, a 9-month permissive dialing and customer education period, and a one month “waiting period” after mandatory dialing begins before the assignment of the first NXX code from the new area code. Due to the recent gains in the projected lives of both the 715 and 920 area codes, the Commission has the ability to establish longer intervals.³⁷

If the Commission prefers to split the 715 and/or the 920 area codes, it has the opportunity to establish the timing intervals associated with Industry’s network planning and customer education period, the permissive dialing period and the recorded announcement period.³⁸ In general, geographic splits should allow for at least 6 to 9 months for network preparation and customer education, 6 to 9 months for permissive dialing and 6 to 9 months for the recorded announcement period.³⁹

Once the Commission has selected the method of relief that it would like implemented in the 715 and 920 area codes, as well as the timing of the associated implementation steps, it must determine when the implementation of the selected relief plan should begin. As evidenced by the recent change in the projected exhaust dates for both the 715 and 920 area codes, forecasts can be “fluid,” making the implementation of the chosen relief method somewhat challenging. The Commission could specify the implementation schedule now, or it could set some

³⁷ Although the Commission has the ability to establish the implementation intervals associated with either area code relief method it selects, Industry guidelines require that relief is in place three months prior to the projected exhaust date of the current area code. For example, since the 715 area code is currently forecasted to exhaust in the 1st quarter of 2011, relief must be in place by the 4th quarter of 2010. This leaves approximately 25 months from the date of this memo for Industry to plan for and implement the selected relief plan.

³⁸ A description of these activities begins on page 6 of this memorandum.

³⁹ NANPA notes that the recorded announcement period should never be less than three months. In addition, if the Commission decides to split the 715 and/or the 920 area codes, it is important to note that relief cannot be implemented until the recorded announcement period has ended. As previously explained, relief must be implemented three months before the projected exhaust date.

parameters (e.g., the length of the permissive dialing period) and direct staff to work with NANPA and Industry to develop an implementation plan to be submitted for further consideration.

Customer education is always an important component of any area code relief plan. Certainly, the nearly coincidental exhaust of two adjacent area codes makes customer education even more critical in these cases. Each telecommunications provider is ultimately responsible for educating its customers.⁴⁰ Industry also reaches out to local governments, the private payphone and alarm associations, directory publishers as well as the E-911 Public Service Answering Points (PSAPs) to ensure a smooth transition. The Commission may wish to consider directing all of the telecommunications providers in the 715 and 920 area codes to provide copies of its customer education materials (i.e., letters, notices, or bill messages) to staff.⁴¹ In addition, the Commission may direct Industry to periodically report on the status of its implementation efforts or to include staff in implementation meetings.

When the 414 area code was split in 1997 to create the 920 area code, certain paging NXX codes were “grandfathered.” This allowed some paging numbers to continue to be associated with the Milwaukee Zone 1 rate center, despite the fact that the numbers were part of the new 920 area code geography. This decision was made to accommodate the paging customers so they would not have to change their numbers. Today, only two grandfathered paging codes remain: 920-990 and 920-998.⁴² Nothing was filed in the 920 docket to suggest that a change to this status is required, nor was information submitted as to the implications of

⁴⁰ Customer education is often done via bill inserts, customer notices, news outlets and public service announcements.

⁴¹ This would not be for pre-approval of these educational/information materials. The submittals would rather be for the purpose of keeping the Commission informed of what efforts are underway.

⁴² These codes are currently assigned to Air Page.

altering this existing grandfather arrangement. If the Commission directs submittal of an implementation plan, it could direct that the status of these codes be addressed therein.

Pursuant to the industry guidelines, once the Commission's area code relief orders have been issued, the NANPA relief planner has one week to request Wisconsin's new area codes. Once the new area codes have been assigned, the Commission needs to issue a press release announcing the new area codes. If the Commission does not issue its own press release, NANPA must issue one within two weeks of the area code assignments. NANPA will conduct the initial implementation meeting with the Industry within 45 days of the new area code assignments. During this meeting, Industry works to develop an implementation schedule based on the Commission's directives, as well as to establish a variety of implementation subcommittees. NANPA publishes a planning letter three weeks after the initial implementation meeting.

Alternatives

The Commission needs to decide the following issues:

A. Relief Method for the 715 Area Code:

1. The Commission may order implementation of an area code overlay for 715.
2. The Commission may order a two-way geographic split of the 715 area code.
 - a. The Commission may split 715 using Industry Alternative (2, 3, 4, 5 or 6).
 - b. The Commission may order a split along another boundary split line.
 - c. The Commission may determine that (Area A/Area B) for the selected split should retain the 715 area code.

B. Implementation Details for the 715 Area Code:

If an overlay relief plan is selected for the 715 area code, the Commission directs staff, with NANPA and Industry to develop an implementation schedule based on the following parameters:

1. Industry's network planning and customer education period shall be at least (9 months/12 months/other).
2. The 10-digit permissive dialing period shall be at least (6 months/9 months/12 months/other).
3. The introduction of the new area code shall begin (one month after mandatory 10-digit dialing begins / at least three months prior to the forecasted exhaust date).

If a geographic split is selected for the 715 area code, the Commission directs staff, with NANPA and Industry to develop an implementation schedule based on the following parameters:

1. Industry's network planning and customer education period shall be at least (9 months/12 months/other).
2. The permissive dialing period shall be at least (6 months/9 months/12 months/other).
3. The recorded announcement period (which coincides with the start of mandatory dialing) shall be at least (6 months/9 months/other).

C. Relief Method for the 920 Area Code:

1. The Commission may order implementation of an area code overlay for 920.
2. The Commission may order a two-way geographic split of the 920 area code.
 - a. The Commission may split 920 using Industry Alternative (2, 3, or 4).

- b. The Commission may split 920 using Industry Alternative 2 modified so that the Stockbridge and Sherwood rate centers are included in Area B.
- c. The Commission may split 920 using Industry Alternative 2 modified so that the Pickett exchange is included in Area A.
- d. The Commission may split 920 using Industry Alternative 2 modified so that the Stockbridge and Sherwood rate centers are included in Area B and the Pickett exchange is included in Area A.
- e. The Commission may order a 920 split along another boundary split line.
- f. The Commission may determine that (Area A/Area B) for the selected split should retain the 920 area code.

D. Implementation Details for the 920 Area Code:

If an overlay relief plan is selected for the 920 area code, the Commission may direct staff, with NANPA and Industry, to develop an implementation schedule based on the following parameters:

- 1. Industry's network planning and customer education period shall be at least (9 months/12 months/other).
- 2. The 10-digit permissive dialing period shall be at least (6 months/9 months/12 months/other).
- 3. The introduction of the new area code shall begin (one month after mandatory 10-digit dialing begins/at least three months prior to the forecasted exhaust date).

If a geographic split is selected for the 920 area code, the Commission may direct staff, with NANPA and Industry, to develop an implementation schedule based on the following parameters:

1. Industry's network planning and customer education period shall be at least (9 months/12 months/other).
2. The permissive dialing period shall be at least (6 months/9 months/2 months/other).
3. The recorded announcement period (which coincides with the start of mandatory dialing) shall be at least (6 months/9 months/other).

E. Customer Education:

1. Telecommunications providers in the 715 and 920 area codes (shall/shall not) provide the Commission with copies of their customer education materials.
2. Commission staff (shall/shall not) monitor Industry's implementation and customer education meetings.
3. Industry (shall/shall not) periodically report on the status of its implementation efforts in the 715 and 920 area codes.

F. Grandfathered Paging Codes in the 920 Area Code

1. The Commission may direct that the 920 implementation plan to be developed by staff, NANPA and Industry address how the grandfathered paging codes (920-990 and 920-998) should be addressed in this relief effort.

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Attachments

715 PETITIONS

NEUSTAR

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August 9, 2002

ORIGINAL

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Commission of Wisconsin
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By Overnight Courier

Lynda L. Dorr, Secretary
Office of the Secretary
Public Service Commission of Wisconsin
Public Service Commission Building
610 N. Whitney Way
Madison, Wisconsin 53705

Re: Petition for Relief of the 715 Area Code

Dear Ms. Dorr:

Enclosed for filing are an original and 20 copies of the petition of NeuStar, Inc., in its role as the North American Numbering Plan Administrator and on behalf of the Wisconsin telecommunications industry, requesting approval of a relief plan for the 715 area code. Please date-stamp the enclosed return copy as received and return it in the enclosed self-addressed stamped envelope.

If you have any questions regarding this matter, please contact the undersigned.

Respectfully submitted,

Kimberly Wheeler Miller

Kimberly Wheeler Miller
Director, Regulatory Law and Public Policy
NeuStar, Inc.

NEUSTAR™

ORIGINAL

Before the
PUBLIC SERVICE COMMISSION OF WISCONSIN
Madison, Wisconsin 53707-7854

NANPA, on behalf of the
Wisconsin Telecommunications Industry,
Petition for Approval of NPA Relief Plan
for the 715 NPA

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Docket No. _____

RECEIVED

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WISCONSIN PUBLIC SERVICE COMMISSION
ST. JAMES
MADISON, WISCONSIN

**PETITION OF THE NORTH AMERICAN NUMBERING
PLAN ADMINISTRATOR ON BEHALF OF THE
WISCONSIN TELECOMMUNICATIONS INDUSTRY**

NeuStar, Inc., the North American Numbering Plan Administrator ("NANPA"), in its role as the neutral third party NPA Relief Planner for Wisconsin under the North American Numbering Plan and on behalf of the Wisconsin telecommunications Industry ("Industry"),¹ petitions the Public Service Commission of Wisconsin ("Commission")² to approve the Industry's consensus decision to recommend to the Commission an all-services distributed overlay as its first choice for relief for the 715 numbering plan area ("NPA").³ Should the Commission reject an all-services overlay relief plan, the Industry recommends, via the consensus process, that the Commission approve a north to south geographic split approximately

¹ The Industry is composed of current and prospective telecommunications carriers operating in, or considering operations within, the 715 area code of Wisconsin.

² The Federal Communications Commission ("FCC") delegated authority to review and approve NPA relief plans to the states. See 47 C.F.R. § 52.19.

³ As the neutral third party administrator, NANPA has no independent view regarding the relief option selected by the Industry.

through the midsection of the 715 NPA as the least disruptive split alternative.⁴ The Industry submits its recommendations to the Commission based upon NANPA's projections that absent NPA relief, the supply of central office codes (often referred to as "CO" or "NXX" codes) for the 715 NPA will exhaust during the second quarter of 2005. In order to allow sufficient time for completion of the selected relief plan prior to exhaust of CO codes in the 715 NPA, and if the Commission adopts the Industry's overlay relief plan, the Industry recommends that the Commission approve its nineteen month implementation schedule. In support of this petition and on behalf of the Industry, NANPA submits the following:

I. BACKGROUND

The 2001 NRUF (Number Resource Utilization Forecast) and NPA Exhaust Analysis June 1, 2001 Update indicated that the 715 NPA will exhaust during the second quarter of 2005.⁵ Due to the projected exhaust, NANPA notified the Commission and the Industry on April 9, 2002 that NPA relief needed to be addressed. The Industry met on June 4, 2002, via conference call, to discuss various relief alternatives.⁶ Pursuant to the NPA Relief Planning Guidelines, NANPA distributed an Initial Planning Document ("IPD") to the Industry prior to the relief

⁴ In order to plan for the introduction of new area codes, NANPA and the Industry utilize the NPA Code Relief Planning & Notification Guidelines (INC 97-0404-016, Nov. 13, 2000) ("NPA Relief Planning Guidelines"). The NPA Relief Planning Guidelines assist NANPA, the Industry and Regulatory Authorities within a particular geographic NPA in the planning and execution of relief efforts. The NPA Relief Planning Guidelines can be accessed on the ATIS web site located at <http://www.atis.org/atis/clc/inc/incdocs.htm>.

⁵ 2001 NRUF and NPA Exhaust Analysis June 1, 2001 Update. Following the June 4 meeting, NANPA released the 2002 NRUF and NPA Exhaust Analysis, June 5, 2002 ("2002 NRUF Report"). The 2002 NRUF Report lists the same projected exhaust for the 715 NPA – second quarter 2005. The 2002 NRUF Report can be accessed on the NANPA web site at <http://www.nanpa.com>.

⁶ A copy of the June 4 meeting minutes, including a list of attendees, is attached as Exhibit A.

planning meeting.⁷ The IPD contained descriptions, maps, general facts and assumptions, and the projected lives of one all-services distributed overlay relief alternative and five geographic split alternatives, two of which were developed by the Industry prior to the June 4 meeting.

More specifically, the Industry participants considered the following alternatives:

- Alternative #1 – All-Services Distributed Overlay: A new NPA code would be assigned to the same geographic area as the existing 715 NPA. Alternative #1 has a projected life of 12 years.
- Alternative #2 – Geographic Split: The proposed split boundary line runs along rate center boundaries in a north to south direction and approximates the LATA boundaries between LATA 352 and LATA 350. The proposed boundary runs west of Mercer, Brantwood, Medford, Greenwood and Pittsville and creates two new NPA areas. The western area is referred to as “Area A” and the eastern area is referred to as “Area B.” Area A has a projected NPA life of 9 years to exhaust and Area B has a projected NPA life of 17 years to exhaust.
- Alternative #3 – Geographic Split: The proposed split boundary line runs along rate center boundaries in a west to east direction south of the Danbury, Spooner and Winter rate centers. The line then turns south and runs west of the Kennan, Medford, Owen, Greenwood, and Pittsville rate centers and creates two new NPA areas. The smaller, southwestern area is referred to as “Area B” and the remainder is referred to as “Area A.” Area A has a projected NPA life of 10 years to exhaust and Area B has a projected NPA life of 16 years to exhaust.
- Alternative #4 – The proposed split boundary line runs along rate center boundaries in a west to east direction south of the Star Prairie, Clear Lake, New Auburn, Eagle Point, and

⁷ A copy of the IPD is attached as Attachment 3 to Exhibit A.

Stetsonsville rate centers. The line then turns south and runs west of the Edgar, Mosinee, Elderon and Waupaca rate centers and creates two new NPA areas. The smaller, southwestern area is referred to as "Area B" and the remainder is referred to as "Area A." Area A has a projected NPA life of 10 years to exhaust and Area B has a projected NPA life of 16 years to exhaust.

- Alternative #5 – Geographic Split: The proposed split boundary line runs along rate center boundaries in a west to east direction south of the Star Prairie, Clear Lake, Mosinee, and Marion rate centers and creates two new NPA areas. The smaller, southern area is referred to as "Area B" and the remainder is referred to as "Area A." Area A has a projected NPA life of 11 years to exhaust and Area B has a projected NPA life of 14 years to exhaust.
- Alternative #6 – Geographic Split: The proposed split boundary line runs along rate center boundaries in a north to south direction west of Land of Lakes and curves north of Minocqua and Lac Du Flambeau and then turns south and runs west of Tomahawk and the north of Rib Lake. The proposed boundary creates two new NPA areas. The western area is referred to as "Area A" and the eastern portion is referred to as "Area B." Area A has a projected NPA life of 9 years to exhaust and Area B has a projected NPA life of 18 years to exhaust.

At the June 4 meeting, the participants discussed the attributes of the relief alternatives and reached consensus to recommend to the Commission Alternative #1, the all-services distributed overlay plan, as their first choice for relief for the 715 NPA.⁸ As their second choice, the Industry participants reached consensus to recommend Alternative #6, a geographic split, should the Commission reject an all-services distributed overlay relief plan. The Industry stated

⁸ See Attachment 3 to Exhibit A for a list of Industry agreed upon attributes of geographic splits and overlays.

that Alternative #6 was the least disruptive split alternative. The Industry eliminated from consideration all the remaining split alternatives because the split lines divide several end office switch host-remote arrangements and therefore would place an undue burden on the service providers. Additionally, Alternative #5 adversely impacts certain existing dialing patterns and ECC calling plans and it separates communities of interest. Alternative #3 also adversely impacts existing dialing plans.

The Industry chose Alternative #1 as its first choice for relief because it would create a simple, uniform dialing plan throughout the 715 NPA, which would reduce customer confusion and would not affect small business and the tourism industry. The Industry chose Alternative #6 as its second choice for relief because it approximates existing LATA boundary lines and was the least disruptive of the geographic split plans.

II. DESCRIPTION OF THE RECOMMENDED RELIEF PLANS

Alternative #1, the all-services distributed overlay, would superimpose a new NPA over the same geographic area covered by the existing 715 NPA. All existing customers would retain the 715 area code and would not have to change their telephone numbers. Consistent with FCC regulations, the relief plan would require 10-digit dialing for all local calls within and between the 715 NPA and the new NPA.⁹ Permissive 1+10-digit dialing will be available at the discretion of individual service providers. All toll calls, whether the calls are to the home NPA or a foreign NPA, will be dialed using 1+10 digits. All Extended Community Calling ("ECC") calls will be dialed on a 10-digit basis with permissive 1+10 digits available at the service provider's discretion. All operator-assisted calls will require customers to dial zero plus 10

⁹ 47 C.F.R. §52.19(c)(3)(ii).

digits. When the 715 NPA exhausts, all CO code assignments will be made from the new overlay area code. The projected life of Alternative #1 is 12 years.

Alternative 6, a geographic split, would split the 715 NPA into two NPAs with the dividing boundary separating the 715 NPA into an eastern and western half. A geographic split requires customers located within the area receiving the new area code to change their telephone numbers. All local calls within the home NPA, including Extended Area Service ("EAS") calls will continue to be dialed using seven-digit. At their discretion, service providers may provide permissive 1+10-digit dialing for such calls. The Industry recommends that all home toll calls require 1+10-digit dialing and that all calls terminating in a foreign NPA, whether local or toll, be dialed using 1+10-digit dialing. All operator-assisted calls will require customers to dial zero plus 10 digits. The projected lives of the two NPAs created by Alternative #6 are 9 and 18 years.

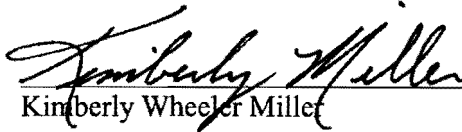
Industry participants reached consensus to recommend to the Commission a 19-month schedule for implementation of the overlay relief alternative. The schedule recommends a nine-month network preparation period and an additional nine-month permissive dialing period for purposes of educating customers on ten-digit dialing. Mandatory 10-digit dialing begins after the conclusion of the permissive dialing period. The first CO code in the new relief NPA will be activated one month after the conclusion of the permissive dialing period.¹⁰ The recommended schedule is dependent upon the Commission's adoption of an overlay as the means of relief for the 715 NPA. Adhering to the proposed timeframe will avoid the denial or delay of service to telecommunications providers' customers due to the unavailability of CO codes.

¹⁰ The activation date is the effective date for the CO codes assigned from the new NPA.

III. CONCLUSION

The Industry has determined the need to initiate relief efforts for the 715 NPA in Wisconsin to prevent the exhaust of numbering resources. The Industry respectfully requests that the Commission issue an order approving either the Industry's first choice for relief for the 715 NPA, an all-services distributed overlay or the Industry's second choice, a two-way geographic split. The Industry also requests that the order approve the Industry-recommended 19-month schedule for the implementation of the overlay.

Respectfully submitted,



Kimberly Wheeler Miller

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August 9, 2002

EXHIBIT A

**715 NPA - WISCONSIN
RELIEF PLANNING MEETING MINUTES
VIA CONFERENCE CALL
JUNE 4, 2002**

WELCOME, INTRODUCTIONS & AGENDA REVIEW

Mr. Colaco, NeuStar NANPA Senior NPA Relief Planner opened the meeting with introductions, a review of the agenda, the objectives of the meeting and NANPA's roles and responsibilities. A list of attendees can be found in Attachment #1.

REVIEW CONSENSUS PROCESS AND NPA RELIEF PLANNING GUIDELINES

Mr. Colaco stated that the ATIS (Alliance for Telecommunications Solutions) approved industry consensus process would be followed. He read the consensus process and explained how consensus is determined. In addition, Mr. Colaco stated that the minutes would be comprised of consensus items and issues that were not captured by consensus could be expressed in the form of a Statement for the Record (in writing) and they could be conveyed at any point during the meeting. The NPA Code Relief and Planning and Notification Guidelines were referenced and available for review. This document, as well as other relevant NPA assignment and relief guidelines, may be downloaded from the ATIS web site at: (www.atis.org/atis/clc/inc/incdocs.htm).

Additionally, Mr. Colaco explained that the following guidelines would apply in determining consensus during a conference call meeting: NANPA will proceed with the conference call based on those who announced themselves at the start of the call. It is at that time that it will be determined whether enough companies, industry segments, etc. are on the call to warrant continuing. During the course of the meeting some participants may, for any reason, choose to drop off the call. Regardless, this will not influence the meeting proceeding according to the agenda. Silence on the part of the participants will be considered agreement with a proposal, based on those on the call at the time consensus is called. It will not be necessary to determine who is still on the call, when each consensus question is called. If it appears that consensus will be difficult to achieve on a given issue, or if an issue becomes controversial, NANPA may opt to poll the attendees to see who is still participating. Furthermore, at any time during the call, a participant may request a poll of the attendees.

STATUS OF WISCONSIN 715 NPA

Mr. Colaco reviewed the status of the 715 NPA, which reflects a total of 518 NXX codes currently assigned. As of May 28, 2002, 196 NXX codes remain available for assignment in the 715 NPA, while 86 additional NXX codes are classified as unavailable. Of these, 16 are "oddball" or special use codes, 62 are protected for 7-digit dialing, 4 are used for special use, e.g., time, weather, etc., 1 code is classified as "hold", and the remaining 3 codes are designated as test codes. The Year 2001 Number Resource Utilization Forecast (NRUF) projects exhaust of the 715 NPA during the 2nd quarter 2005. Mr. Colaco indicated that NANPA is in the process of

finalizing the 2002 NRUF exhaust forecast, and absent the implementation of pooling, the projected exhaust of the 715 NPA is estimated to remain the same.

The monthly NXX code assignments in the 715 NPA during the past seventeen months have been as follows:

2001												2002				
JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY
5	4	1	3	0	12	3	5	2	2	2	20	5	2	3	1	5

The actual twelve-month average assignment rate since June 2001 to date is 5 codes per month, which is in excess of the 2001 NRUF projection of 3 codes per month.

PRE-IPD CONFERENCE CALL RE-CAP

Mr. Colaco also provided a recap of the pre-IPD conference call held April 23, 2002, which included a review of the NANPA developed proposed relief alternatives. Informal meeting notes resulting from the industry conference were posted to NANPA's document distribution service on April 29, 2002.

PROTECTED CODES

Mr. Colaco informed the industry group they should be aware of the 62 protected codes in the 715 NPA. These codes can't be used within the 715 NPA since they are in use in adjacent NPAs, and are protected from assignment to allow 7-digit dialing to those NPAs from the 715 NPA. The Industry Numbering Committee (INC) Guidelines recommend that protected codes be eliminated before NPA relief is implemented. The industry should investigate to see what could be done to reduce or eliminate them. Considering the annual demand for NNX Codes in the 715 NPA, this considerable amount of protected codes equates to approximately one years' worth of code growth. An industry member asked that NANPA provide the industry of a complete breakdown of the 62 protected codes. NANPA indicated that a list of these codes would be included with these minutes (See Attachment 2). The industry may decide on a later call what to do about these codes.

REVIEW INITIAL PLANNING DOCUMENT (IPD) FOR THE 715 NPA

Mr. Colaco reviewed the Initial Planning Document (IPD) distributed prior to the meeting, which included an all services overlay (Alternative #1) and five 2-way geographic split alternatives (Alternatives #1 through #6). Alternatives #1 through 4 were developed by NANPA, while Alternatives #5 & #6 were submitted for consideration by industry members prior to this meeting. There were no additional alternatives proposed during the relief- planning meeting.

DISCUSSION OF RELIEF ALTERNATIVES

General discussion ensued regarding the attributes of geographic splits and overlay alternatives. An industry participant asked if the projected lives included the protected codes. NANPA stated that since these codes were not available, they cannot be counted and would continue to be

protected. Another participant asked if any of the split lines could be moved or modified for additional alternatives. NANPA assured the attendees that anyone was free to propose additional relief alternatives for consideration during this meeting. Mr. Colaco queried the industry participants for additional proposed alternatives. There were no additional proposed alternatives.

INDUSTRY SEGMENTS IDENTIFIED:

For purposes of determining consensus, NANPA stated after reviewing the attendee list, there were representatives from 7 wireless companies, 3 CLEC companies and 13 ILEC companies.

CONSENSUS ON ELIMINATION OF RELIEF ALTERNATIVES

After discussion, a proposal was made, and consensus was reached to eliminate Alternatives # 2 and # 4 for the following reasons: These split alternatives split several end-office switch host-remote arrangements. This would put an undue burden on the service providers.

After discussion, a proposal was made, and consensus was reached to eliminate Alternative # 5 for the following reasons: This split alternative separates several switch host-remote arrangements and the host-remotes from the tandem arrangements for several service providers. This split alternative also impacts dialing patterns, separates communities of interest and impacts some ECC calling plans.

After discussion, a proposal was made, and consensus was reached to eliminate Alternative # 3 for the following reasons: This split separates certain dialing plans, separates the host-remote arrangements between the tandems in Rice Lake and Eau Claire. Additionally, it was noted by a participant that the two areas created by Alternative #3 seem to have disproportionate population levels between areas A & B.

REACH CONSENSUS ON RELIEF ALTERNATIVE

After further discussion, a proposal was made, and consensus was reached to recommend Alternative # 1, the overlay, as the industry's first choice of relief, to the Wisconsin Public Service Commission. With the overlay the 10D dialing would eliminate a lot of confusion for the customers and standardize dialing in the NPA, avoid impacting the tourism industry, and small businesses.

It was further agreed that if the Wisconsin PSC rejects an overlay the industry recommends alternative # 6, a two-way geographic split, as the least disruptive alternative of the splits that were addressed. It was noted that NPA boundary line depicted in Alternative #6 approximates existing LATA boundaries.

ESTABLISH IMPLEMENTATION SCHEDULE

A recommendation was made, and consensus was reached to recommend the following 19-month implementation interval described below. It was noted that this proposed implementation schedule is applicable only to the overlay relief alternative

EVENT	TIMEFRAME
Total Interval	19 months
Network Preparation	9 months
Permissive 10-Digit Dialing and Customer Education Period (Calls within 715 NPA can be dialed using 7 or 10 digits)	9 months
First Code Activation (Effective date for codes from the new NPA)	1 month (after Mandatory)

REACH CONSENSUS ON DIALING PLAN (Alternative #1 – OVERLAY)

A proposal was made, and consensus was reached to recommend the following dialing plan for the all-services overlay to the Wisconsin Public Service Commission:

- All home and foreign NPA local calls are dialed on a 10-digit basis, i.e., NPA-NXX-XXXX. Permissive 1+10 digit local dialing is available at the Service Providers option.
- All home and foreign NPA toll calls are dialed with a prefix "1" plus 10 digits, i.e., 1+NPA-NXX-XXXX.
- All Extended Community Calling (ECC) calls are dialed on a 10-digit basis or with a prefix "1" plus 10 digits, i.e., 1+NPA-NXX-XXXX, at the service providers discretion.
- All Operator Assisted calls, including credit card, collect and third party calls, are dialed with a prefix "0" plus 10 digits, i.e., 0+NPA-NXX-XXXX.

SUGGESTED DIALING PLAN FOR AN NPA SPLIT (Alternative # 6 – Split)

A proposal was made and consensus reached to include as an attachment of the petition in case the PSC decides on a geographic split, the industry recommends the following dialing plan:

- All home NPA (HNPA) local calls, including Extended Area Service (EAS), will be dialed either on a 7-digit basis with no prefix – i.e. NXX-XXXX (7 digits) or, optionally, with a prefix 1 and 10 digits (1+NPA-NXX-XXXX)
- All home NPA (HNPA) toll calls will be dialed with a prefix 1 and 10 digits (1+NPA-NXX-XXXX)
- All foreign (FNPA) calls, local and toll, terminating in NPAs other than the 715 NPA will be dialed with a prefix "1" and 10 digits – i.e. 1+FNPA-NXX-XXXX (1+10 digits), or when the local exchange carrier elects to exercise the option of 10-digit dialing.
- All operator assisted calls, including credit card, collect and third party calls, will be dialed with a "0" prefix and 10 digits – i.e. 0+NPA-NXX-XXXX (0+10 digits).

REACH CONSENSUS for NANPA FILING INDUSTRY EFFORTS WITH COMMISSION

Consensus was reached that NANPA would file the results of the 715 NPA relief plan in a petition, on behalf of the industry, to the Wisconsin Public Service Commission following an industry conference call that will be held July 24, 2002 to review and approve the documentation.

STATEMENTS FOR THE RECORD

There were no statements for the record from any of the participants.

REVIEW OF DRAFT MEETING MINUTES & DRAFT COMMISSION FILING

Consensus was reached that the draft minutes resulting from this meeting will be distributed to the industry by July 3, 2002. Consensus was also reached to conduct a conference call to review and approve these minutes as well as the draft filing to the Wisconsin Commission. Details of the call are as follows:

Date: Wednesday, July 24, 2002

Time: 1:00 p.m. Central (2:00 p.m. Eastern and 11:00 a.m. Pacific)

Dial-in Number: 847-619-6648

Pass code: 7880548#

During the conference call held July 24, 2002, to review and approve these meeting notes and the draft petition, consensus was reached that NANPA will file the petition with the Wisconsin Commission on Monday, August 12, 2002. Additionally, NANPA will post copies of the final meeting minutes and the filed petition on its Document Distribution Service (DDS) web site by August 12, 2002.

ATTACHMENT 1 TO
EXHIBIT A

**715 NPA - WISCONSIN
RELIEF PLANNING MEETING MINUTES
VIA CONFERENCE CALL
JUNE 4, 2002**

PARTICIPANTS

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ATTACHMENT 2 TO
EXHIBIT A

715 NPA
NXX CODES PROTECTED FOR 7-DIGIT DIALING

ATTACHMENT 2

NPA	NXX
715	200
715	230
715	242
715	300
715	303
715	323
715	351
715	380
715	390
715	400
715	430
715	433
715	436
715	437
715	439
715	465
715	480
715	500
715	521
715	522
715	525
715	527
715	544
715	548
715	596
715	600
715	621
715	622
715	624
715	625
715	626

NPA	NXX
715	628
715	655
715	691
715	705
715	721
715	722
715	724
715	725
715	727
715	728
715	729
715	733
715	734
715	740
715	753
715	786
715	788
715	800
715	809
715	840
715	863
715	867
715	888
715	897
715	900
715	932
715	935
715	982
715	989
715	991
715	998

**ATTACHMENT 3 TO
EXHIBIT A**

May 6, 2002

TO: 715 NPA (**Wisconsin**) Code Holders and Other Industry Members

RE: Industry Meeting to Plan Relief for the 715 Area Code

As stated in my memo dated April 9, 2002, the 715 area code in Wisconsin is projected to exhaust during the second quarter of 2005. Enclosed is the Initial Planning Document (IPD) for your review prior to the June 4, 2002 scheduled industry conference call meeting.

The IPD contains the projected life of several possible relief alternatives and the matching total codes at exhaust. If you wish to obtain a copy of the number of NXX codes currently assigned to each rate center and the projected growth in demand for NXX codes in the 715 NPA, please notify me. The primary objective of this meeting will be for the industry to review the alternatives included in the IPD and other industry proposed alternatives in order to hopefully reach consensus on a single relief plan to be presented to the Wisconsin Public Service Commission for their consideration. The format of the meeting will follow the consensus process (attached); NANPA will adhere to the process, developed in an open industry forum, under the auspices of Alliance for Telecommunications Industry Solutions (ATIS). Participants should have a copy of the "NPA Code Relief Planning and Notification Guidelines" INC 97-0404-016 readily available for reference during the conference call.

After the April 23, 2002 industry conference call to discuss the pre IPD, several support statements were submitted. I have included them for your information.

Because the impacts of NPA relief are so significant, NANPA strongly encourages your participation on June 4, 2002. Experience has demonstrated that this could be the only meeting of the industry before a decision is reached on a recommended plan. An agenda is attached. Changes to the agenda will be addressed at the start of the meeting and modified according the consensus of the meeting participants. Details regarding the meeting follow:

June 4, 2002

9:00 a.m. Central (10:00 a.m. Eastern and 7:00 a.m. Pacific)

(847) 413-3193 plus pass code 7272114#

If you plan to attend this meeting, please complete and return the enclosed Advance Meeting Reservation Form to me by May 21, 2002. You may also respond via email at pamela.kenworthy@neustar.biz with your intention to attend.

If you have anything that you would like to discuss before the industry meeting, please do hesitate to contact me at (973) 267-7812. You may also contact Frank Colaco, Sr. NPA Relief Planner, at (973) 740-9100 or by e-mail at frank.colaco@neustar.biz. Thank you.

Pamela Kenworthy

Pamela Kenworthy
NPA Relief Planner

**WISCONSIN NPA RELIEF
INITIAL PLANNING CONFERENCE CALL MEETING**

Tuesday, June 4, 2002

(all times are in the Central time zone)

CONFERENCE BRIDGE: (847) 413-3193 plus pass code 7272114#

- 9:00 Welcome and Introductions
- 9:10 NANPA's Role and Responsibilities
- 9:15 Minutes and "Statements For The Record"
- 9:30 Industry Guidelines/Relief Attributes
- 9:45 Review Code Assignment History
- 10:00 Re-cap Pre IPD Conference Call
- 10:15 Review Initial Planning Document
- 11:15 Break
- 11:30 Additional Alternatives from Industry
- 12:00 Lunch
- 1:00 Elimination Of Alternatives
- 2:00 Consensus On Relief Alternative
- 2:10 Consensus on Dialing Plan
- 2:30 Consensus on Implementation Intervals
- 3:00 Statements for the Record
- 3:15 Consensus on NANPA Filing Industry Efforts With Commission
- 3:30 Set Date For Conference Call To Approve Meeting Notes
- 3:45 Complete NANPA Survey
- 4:00 Adjourn

INDUSTRY CONSENSUS PROCESS

Consensus is established when substantial agreement has been reached among interest groups participating in the consideration of the subject at hand. Interest groups are those groups materially and differently affected by the outcome or result of the issue or question being called. Substantial agreement means more than a simple majority, but not necessarily unanimity. Under some circumstances, consensus is achieved when the minority no longer wishes to articulate its objection.

The consensus process is to free from interest group dominance, requiring that all views and objections be considered. This requires that a concerted effort be made toward issue resolution. Input from all participants will be considered carefully and in good faith in seeking and in reaching consensus recommendations and resolutions.

When there are questions or disputes regarding consensus, leaders or participants should ask objecting participant(s) to state the rationale for the objection. Opposition should not be assumed solely on an objecting participant's perceived interest group identity. Once the objecting participant(s) rationale is known and understood, other participants might then be swayed by the merits of the statement and the opportunity to reach a more clear path toward consensus may be achieved.

Therefore, the key factor in determining whether consensus is reached should be the rationale for how a question or issue directly and materially affects any given participant.

Silence on the part of a participant when a resolution to an issue is proposed is considered to be agreement with the proposed resolution. Therefore, all participants are encouraged to articulate their concerns regarding proposed resolutions, and the leadership is expected to ensure that all participants are afforded an opportunity to voice their objections.

General NPA Relief Alternative Attributes

Splits

Overlays

General Attributes of Splits

- Splits provide a single area code for each geographic area. This may minimize confusion for customers outside the area. Implementation is generally understood.
- Splits require an area code change for approximately one-half of customers in a two-way split, and two-thirds of customers in a three-way split.
- Geographic splits permit 7-digit dialing within an area code.
- Stationery, business cards and advertising containing a ten-digit phone number will need to be revised by customers receiving the new area code.
- Future splits will reduce the geographic size of the area code.

General Attributes of Overlays

- With an overlay there will be more than one area code in a geographic area. Where the overlay is a new concept some customer education is desirable.
- An overlay will not require existing customers to change their area code.
- An overlay requires customers to dial 10 digits (or 1 + 10 digits) for all calls
- There is no need to revise stationery, business cards and advertising unless they contain only seven digit phone numbers.
- An overlay will end further shrinking of the geographic size of the area code because subsequent relief will likely be another overlay.

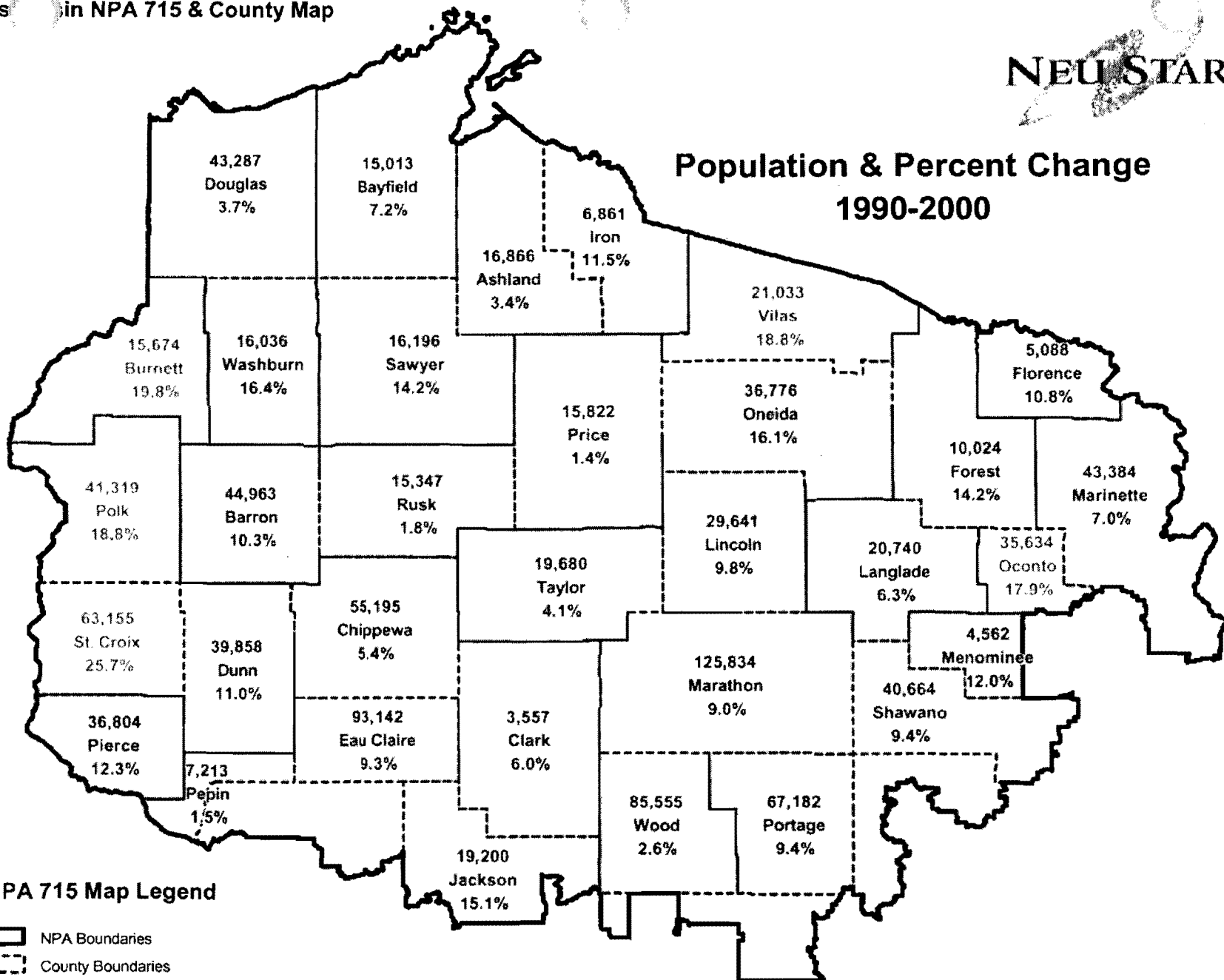
General NPA Relief Alternative Attributes

Overlays

General Attributes of Concentrated Growth Overlays

- Special and unique monitoring methods, not currently available, are required for exhaust for the area outside of the concentrated overlay, and it is difficult to predict the exhaust of the area outside of the concentrated overlay area.
 - Normally, no existing customers will be required to change their telephone number.
 - Customer confusion pertaining to dialing for a concentrated overlay could exist.
 - A concentrated growth overlay minimizes implementation of 10 digit dialing for customers.
 - Customer confusion pertaining to dialing for a concentrated overlay could exist.
 - In order to preserve codes, the NPA must be identified as needing relief and the relief plan needs to be approved much earlier in order to preserve enough codes to serve the non-concentrated overlay area.
-

Population & Percent Change 1990-2000



NPA 715 Map Legend

- NPA Boundaries
- County Boundaries

Wisconsin NPA 715 Rate Center & Cities > 10K Map

NEU STAR



NPA 715 NXX Summary
Data as of May 28, 2002

<u>NPA</u>	<u>715</u>			
Assigned NXXs	518			
Protected	62			
Reserved	4			
Hold	1			
Test NXXs	3			
Unavailable NXXs (see note)	16			
Available NXXs	196			
Total	800			
<u>Codes assigned NPA 715</u>	<u>Jan-01</u>	<u>Feb-01</u>	<u>Mar-01</u>	<u>Apr-01</u>
	5	4	1	3
	<u>May-01</u>	<u>Jun-01</u>	<u>Jul-01</u>	<u>Aug-01</u>
	0	12	3	5
	<u>Sep-01</u>	<u>Oct-01</u>	<u>Nov-01</u>	<u>Dec-01</u>
	2	2	2	20
	<u>Jan-02</u>	<u>Feb-02</u>	<u>Mar-02</u>	<u>Apr-02</u>
	5	2	3	1
	<u>May-02</u>			
	5			
Note: Unavailable indicates codes that are unavailable for assignment. These codes include, but are not limited to, test and special use codes (e.g., 958, 959, 555, time), N11 and other unique codes (e.g., 976, 950), codes set aside for pooling, and codes with special dialing arrangements (e.g., 7-digit dialing cross NPA boundary).				

Initial Planning Document

For Relief of Wisconsin 715 NPA

May 2001 NEP Projected Exhaust Date 2Q2005

North American Numbering Plan Administration

Pamela Kenworthy
NPA Relief Planner

715 NPA Relief Alternatives

WISCONSIN

Numbering Plan Area 715 Born on Date: 1947

NPA RELIEF PLANNING TOOL ASSUMPTIONS

NRUF DATE:	May 2001
PROJECTED EXHAUST DATE:	2 nd Quarter 2005
ANNUALIZED CO CODE DEMAND PROJECTION:	59
MONTHLY CO CODE DEMAND PROJECTION:	3.0
LERG DATA:	March 2002
NATIONAL THOUSANDS BLOCK ROLLOUT	6 th Quarter (6/15/03 –9/14/03)

NPA Relief Alternatives

Overlay Alternative

Alternative #1 – All Services Distributed Overlay

A new NPA code would be assigned to the same geographic area as the existing 715 NPA. Customers would retain their current telephone numbers; however, ten-digit local dialing by all customers between and within area codes in the area covered by the new code would be required. Codes in the overlay NPA will be assigned upon request with the effective date of the new area code. At exhaust of the 715 NPA all code assignment will be made in the overlay area code.

Total CO Codes at Exhaust = 718
Area code life in years = 12

NPA Split Alternatives

The exhausting NPA is split into two geographic areas and a new NPA is assigned to one of the areas formed by the split. All split plans would require ten-digit local dialing between NPAs in the same extended local calling area. Within an NPA, seven-digit dialing would be permitted.

Alternative #2 – NPA Split

The proposed boundary line runs along rate center boundaries approximately following the LATA boundaries between LATA 352 and LATA 350. The proposed boundary runs west of Mercer, Brantwood, Medford, Greenwood and Pittsville.

Area A
Total CO Codes at Exhaust = 409
Area code life in years = 9

Area B
Total CO Codes at Exhaust = 309
Area code life in years = 17

715 NPA Relief Alternatives

Alternative #3 – NPA Split

The proposed boundary line runs along rate center boundaries in a west/east direction south of the rate centers Danbury, Spooner and Winter. The line then turns south and runs west of the rate centers Kennan, Medford, Owen, Greenwood and Pittsville.

Area A

Total CO Codes at Exhaust = 402

Area code life in years = 10

Area B

Total CO Codes at Exhaust = 316

Area code life in years = 16

Alternative #4 – NPA Split

The proposed boundary line runs along rate center boundaries in a west/east direction south of the rate centers Star Prairie, Clear Lake, New Auburn, Eagle Point, Gilman, Medford, and Stetonsville. The line then turns south and runs west of the rate centers Edgar, Mosinee, Elderon, Iola and Waupac.

Area A

Total CO Codes at Exhaust = 392

Area code life in years = 10

Area B

Total CO Codes at Exhaust = 326

Area code life in years = 16

Industry Developed Alternatives

Alternative #5 – NPA Split

The proposed boundary line runs along rate center boundaries in a west/east direction south of the rate centers Star Prairie, Clear Lake, New Auburn, Cornell, Gilman, Medford, Stetonsville, Edgar, Mosinee, Elderon and Marion.

Area A

Total CO Codes at Exhaust = 378

Area code life in years = 11

Area B

Total CO Codes at Exhaust = 340

Area code life in years = 14

Alternative #6 – NPA Split

The proposed boundary line runs along rate center boundaries in a north/south direction. The boundary line runs west of Land of Lakes and curves north of Minocqua and Lac Du Flambeau before turning south and running west of Tomahawk and then north of Rib Lake. The boundary line continues to run south west of Medford, Owen, Neillsville and Pittsville.

Area A

Total CO Codes at Exhaust = 418

Area code life in years = 9

Area B

Total CO Codes at Exhaust = 300

Area code life in years = 18

WISCONSIN

PROJECTED LIVES OF RELIEF ALTERNATIVES

In Years





Alternative	Area A		Area B
#1		12	
#2	9		17
#3	10		16
#4	10		16
#5	11		14
#6	9		18

Alternative #1 All Services Distributed Overlay



Area A



-  NPA Boundaries
 Rate Center Boundaries
 Split Line
 LATA Boundaries

ALTERNATIVE_#2	PROJECTED_LIVES
Area "A"	9 Years
Area "B"	17 Years

Alternative #4 NPA Split



Alternative #5 NPA Split



ALTERNATIVE #5	PROJECTED LIVES
Area "A"	11 Years
Area "B"	14 Years

Alternative #6 NPA Split



NPA 715 Map Legend

- NPA Boundaries
- Rate Center Boundaries
- Split Line

ALTERNATIVE_#6	PROJECTED_LIVES
Area "A"	9 Years
Area "B"	18 Years



RATE CENTER TABLE

Count of NXX	CATEGORY						Grand Total
RC FULL NAME	CLEC	ICO	PCS	RBOC	WIRELESS	(blank)	
ALMA CENTER			1				1
ALMENA			1				1
ALMOND			1				1
AMBERG			1				1
AMERY			1				1
AMHERST			1				1
ANTIGO		1	2			2	5
ARGONNE			1				1
ARKANSAW			1				1
ASHLAND		1	2			1	4
ATHENS			1				1
AUBURNDALE			2				2
AUGUSTA			1				1
AURORA			1				1
BALDWIN			2				2
BALSAM LAKE		1	1			1	3
BARNES			1				1
BARRON		1	1			1	3
BAY CITY			1				1
BAYFIELD		1	1			2	4
BEAR CREEK			1				1
BENNETT			1				1
BENOIT			1				1
BIRCHWOOD			1				1
BIRNAMWOOD			1				1
BLACK RIVER FALLS			1			1	2
BLOOMER			1				1
BONDUEL			1				1
BOULDER JUNCTION			1				1
BOWLER			1				1
BOYCEVILLE			1				1
BOYD			1			1	2
BRANTWOOD			1				1
BRUCE			1				1
BUTTERNUT			1				1
CABLE			1				1
CADOTT			1				1
CAMERON			1				1
CANTON			1				1
CECIL			1				1
CENTURIA		1	1			1	3
CHETEK		1	1			1	3
CHILI			1				1
CHIPPEWA FALLS					4		4
CLAYTON			1				1
CLEAR LAKE			1				1
CLEGHORN			1				1
CLINTONVILLE			1			3	4
COLBY			1			1	2
COLFAX		1	1				2
COLOMA			1				1
CORNELL			1			2	3
CORNUCOPIA			1				1
CRANDON			1				1
CRESCENT LAKE			1				1
CRIVITZ			1				1
CUMBERLAND			1			1	2
CUSHING			1				1
DAIRYLAND			1				1
DALLAS			1				1
DANBURY			1				1
DEER PARK			1				1
DORCHESTER			1				1
DOWNSVILLE			1				1

RATE CENTER TABLE

DRESSER		1					1
DRUMMOND		1					1
DURAND		1			1		2
EAGLE POINT		1					1
EAGLE RIVER	1	2			1		4
EAU CLAIRE	4		2	14	25		45
EAU GALLE		1					1
EDGAR		1					1
ELCHO		1					1
ELDERON		1					1
ELEVA		1					1
ELK LAKE		4					4
ELK MOUND		1					1
ELLSWORTH				1			1
ELMWOOD		1					1
EXELAND		1					1
FAIRCHILD		1					1
FALL CREEK		1					1
FALUN		1					1
FLORENCE		1					1
FOX CREEK		1					1
FREDERIC		1			2		3
GILMAN		1					1
GILMANTON		1					1
GLEASON		1					1
GLEN FLORA		1					1
GLENWOOD CITY	1	1					2
GLIDDEN		1					1
GOODMAN		1					1
GORDON		1					1
GRANDVIEW		1					1
GRANTON		1					1
GRANTSBURG		1					1
GREEN BAY					5		5
GREENWOOD		1					1
GRESHAM		1					1
HAGER CITY		1					1
HAMMOND		1					1
HANCOCK		1					1
HARMONY		1					1
HATLEY		1					1
HAWKINS		1			1		2
HAYWARD	1	2			1		4
HIXTON		1					1
HOLCOMBE		1			1		2
HOULTON				1			1
HUDSON	1			4	1		6
HURLEY		2			3		5
INDEPENDENCE		1					1
IOLA		1					1
IRON RIVER		1					1
JIM FALLS		1			1		2
JUMP RIVER		1			1		2
JUNCTION CITY		1					1
KENNAN		1					1
KESHENA		1					1
KNAPP		1					1
LA POINTE		1					1
LAC DU FLAMBEAU	1	1					2
LADYSMITH		1			2		3
LAKE NEBAGAMON		1					1
LAKE TOMAHAWK		1					1
LAKEWOOD		1					1
LAND O LAKES		1					1
LAONA		1					1
LEWIS		1					1

RATE CENTER TABLE

LINDSEY		1				1
LONG LAKE		1				1
LOYAL		1				1
LUCK		1				1
MAIDEN ROCK		1				1
MANITOWISH WATERS		1				1
MAPLE		1				1
MARATHON		1				1
MARENGO		1				1
MARINETTE		2	1		3	6
MARION		1				1
MARSHFIELD		6	1		1	8
MASON		1				1
MATTOON		1				1
MEDFORD		2				2
MELLEN		1				1
MENOMONIE	1		1	3	6	11
MERCER		1				1
MERRILL		2			1	3
MERRILLAN		1				1
MILL CREEK		1				1
MILLTOWN		1				1
MINOCQUA		2			1	3
MINONG		1				1
MONDOVI		1				1
MONT DU LAC				1		1
MOSINEE		2				2
NAMEKAGON LAKE		1				1
NEILLSVILLE		1				1
NEKOOSA		1				1
NELSON		1				1
NEOPIT		1				1
NEW AUBURN		1				1
NEW RICHMOND		2				2
NIAGARA		1				1
NORTHFIELD		1				1
OGEMA		1				1
OSCEOLA		1			1	2
OSSEO		1			1	2
OWEN	1	1				2
PARK FALLS	1	1				2
PELICAN LAKE		1				1
PEMBINE		1				1
PEPIN		1				1
PESHTIGO		1			1	2
PHELPS		1				1
PHILLIPS		1				1
PICKEREL		1				1
PIGEON FALLS		1				1
PITTSVILLE		1				1
PLAINFIELD		1				1
PLEASANTVILLE		1				1
PLUM CITY		1				1
POLONIA	1	1				2
POPLAR		1				1
PORT EDWARDS		2				2
PORT WING		1				1
PRAIRIE FARM		1				1
PRENTICE		1				1
PRESCOTT		1				1
PRESQUE ISLE		1				1
RADISSON		1				1
RHINELANDER		5	1		7	13
RIB LAKE		1				1
RICE LAKE	2	2	1		3	8
RIDGELAND		1				1

RATE CENTER TABLE

RIVER FALLS				2	3	5
ROBERTS				1	1	2
ROCK FALLS		1				1
ROSHOLT		1				1
RUDOLPH		1				1
SAND CREEK		1				1
SARONA		1				1
SAYNER		1				1
SCANDINAVIA		1				1
SHAWANO		2	1		1	4
SHELDON		1				1
SHELL LAKE		1			1	2
SIREN		1				1
SOLO SPRINGS		1				1
SOMERSET		1				1
SOO LAKE		1				1
SPENCER	1	1				2
SPIDER LAKE		1				1
SPOONER		1			1	2
SPREAD EAGLE		1				1
SPRING LAKE (ST CROIX)		1				1
SPRING VALLEY		1				1
SPRINGBROOK		1				1
SPRINGSTEAD		1				1
ST CROIX FALLS		1			1	2
STANLEY		1			3	4
STAR PRAIRIE		1				1
STETSONVILLE		1				1
STEVENS POINT	1		2	7	10	20
STONE LAKE		1				1
STRATFORD	1	1			1	3
STRUM		1				1
SUGAR CAMP		1				1
SUPERIOR	1	5			1	7
TAYLOR		1				1
THORP		1			1	2
THREE LAKES		1				1
TIGERTON		1				1
TOMAHAWK		2			1	3
TRADE LAKE		1				1
TURTLE LAKE		1			1	2
TWIN BRIDGE		1				1
VESPER		1				1
WABENO		1			1	2
WASHBURN	1	1				2
WAUPACA	1		1	2	2	6
WAUSAU	3	14	2		11	30
WAUSAUKEE		1				1
WEBB LAKE		1				1
WEBSTER		1				1
WEYERHAUSER		1				1
WHEELER		1				1
WHITE LAKE		1				1
WHITEHALL		1				1
WINTER		1				1
WISCONSIN RAPIDS		6	1		2	9
WITTENBERG		1				1
WOODVILLE		1				1
(blank)						
Grand Total	32	293	14	40	130	509

715 NPA (Wisconsin) Code Holders¹ and Other Industry Members
Support Statements

¹ Hager Telecom indicated on their reservation form that their preference is Alternative #2

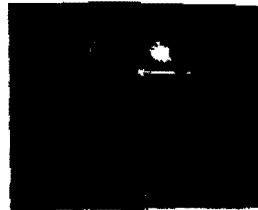
May-06-02 06:58am From-KENWORTHY

9732677921

T-587 P.01

F-940

Box 164, 110 N. SECOND AVENUE
DALLAS, TX 75473
PHONE: 715.837.1011
FAX: 1.800.924.3405
S: 715.837.1196



Telephone Cooperative, Inc
COMMUNICATING SOLUTIONS.
IT'S WHAT WE DO.

CTC WIRELESS
CTC TELCOM
CTC CABLE
CTC NET

April 23, 2002

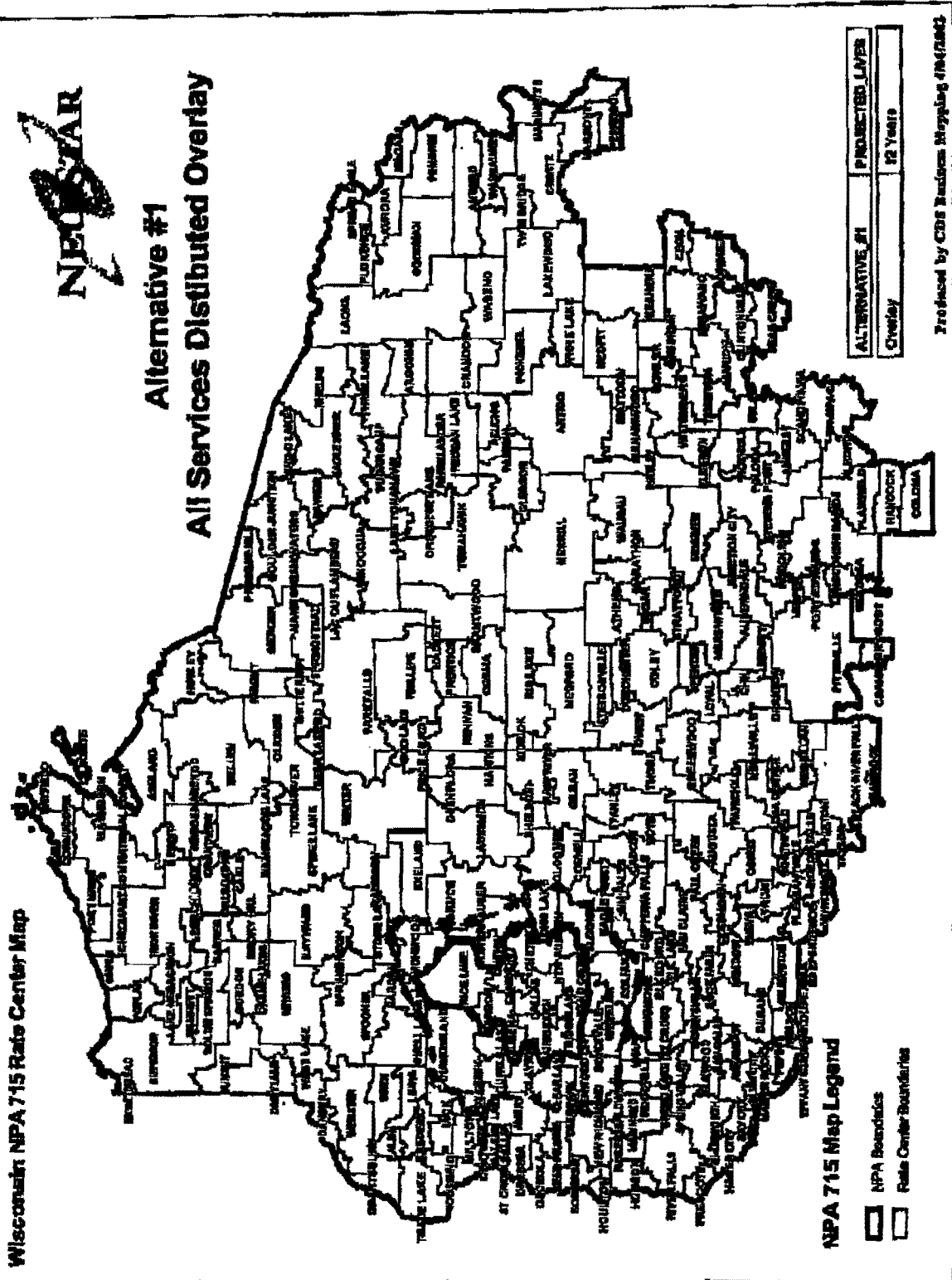
Pamela Kenworthy
NPA Relief Planner

Per the April 23 conference call on Plan Relief for the 715 Area Code, it was requested to submit recommendations to you on the four proposed alternatives that were discussed. Our company, Chibardun Telephone / CTC Telecom would have issues with Alternative # 4. Two of our remote exchanges Ridgeland 715-949, and Sand Creek 715-658 would be split from our Dallas 715-837 Host. We would request that if the Alternative # 4 were considered, that Host/Remote switching is factored into the boundary lines. Our Host/Remote Exchange NPA/NXXs are: Dallas 715-837; Chetek 715-925; Cameron 715-458; Rice Lake 715-434; Almena 715-357; Barron 715-637; Prairie Farm 715-455; Ridgeland 715-949; and Sand Creek 715-658.

I have attached a map that outlines our Host/Remote network. I also have marked the 7 digit EAS/ECC dialing plan currently in use, basically one additional layer of exchanges around our network, indicated by 'dash' lines on the attached map.

Thank you,

Doug Kurschner
Central office Supervisor
Chibardun Telephone/CTC Telecom
110 N 2nd Ave - P.O. Box 164
Dallas, TX 75473



May-08-02 08:58 am From: KENWORTHY

8732677921

T-587 P. 03

F-040

West Wisconsin Telecom Cooperative, Inc.
P.O. Box 115
E4528 Cty Rd. C
Dowdsville, WI 54735
(715) 664-4311 • (715) 664-9962 FAX

To: Pamela Kenworthy Fax: 973/267-7921

From: Tom Davey Date: 4/24/2002

Re: NPA 715 Code Relief Planning Pages: 3

CC: Randy Siler

☐ Urgent ☒ For Review ☐ Please Comment ☐ Please Reply ☐ Please Reply

Comments:

WEST WISCONSIN
P.O. Box 115
E4528 Cty Rd. C
Dowdsville, WI 54735
(715) 664-4311 • (715) 664-9962 FAX

First, I would like to tell you how valuable the short Pro-UPD conference call on NPA 715 was yesterday. I think it was all of us gathered an opportunity to begin thinking about the work ahead of us and to throw our ideas out there. I hope we get into the bigger and more formal forum in June.

The concern raised by Kenworthy and regarding splitting a remote rate center from its host serving office is a valid one and is very important to West Wisconsin Telecom Cooperative. We also have an extensive history of service and this needs to be considered when looking at code relief in the 715 NPA. To help you get into the perspective splitting plans I have attached a list of rate centers for our host/remote network and a copy of the map showing their locations.

Secondly, we are an Access Tandem office in the 715 area and provide tandem trunking for End Offices in the southern quarter of the NPA. We have some concern about placing End Offices that are bonded to our Access Tandem into a different NPA. Although this can be accommodated with new translations in our switching equipment, it presents a higher level of effort to prepare for the split than other plans. So then you can consider the impact of the different plans on our network I have also listed the End Offices bonding on our Access Tandem in the attached list and shown them on the map.

Of the plans presented so far in the process, we support plan #2 as the best option for our situation. It shows the new LATA boundaries along the existing LATA 350/352 lines which are already separated in the translations database and would require the least work on our part and least impact on our customers.

If you have any questions or comments on this information please call me at 715/231-0504 or e-mail me at tdavey@wvtel.net.

Tom Davey

West Wisconsin Telcom Cooperative, Inc.

Host & Access Tandem Rate Center:

Elk Lake

Remote Rate Centers hosted by West Wisconsin Telcom Cooperative:

Downsville

Eau Galle

Rock Falls

Spring Lake

Menard

Spring Valley

Clear Lake

Menomonie (for 24-7 Telcom, Inc. [CLEC])

End Office Rate Centers using West Wisconsin Telcom Cooperative's Access Tandem:

Strum

Eleva

Pleasantville

Pigeon Falls

Northfield

Independence

Durand

Nelson

Gilmanton

Arkansas

Grantsburg

Fahun

Trade Lake

Siren

Luck

Cushing

Milltown

Fox Creek

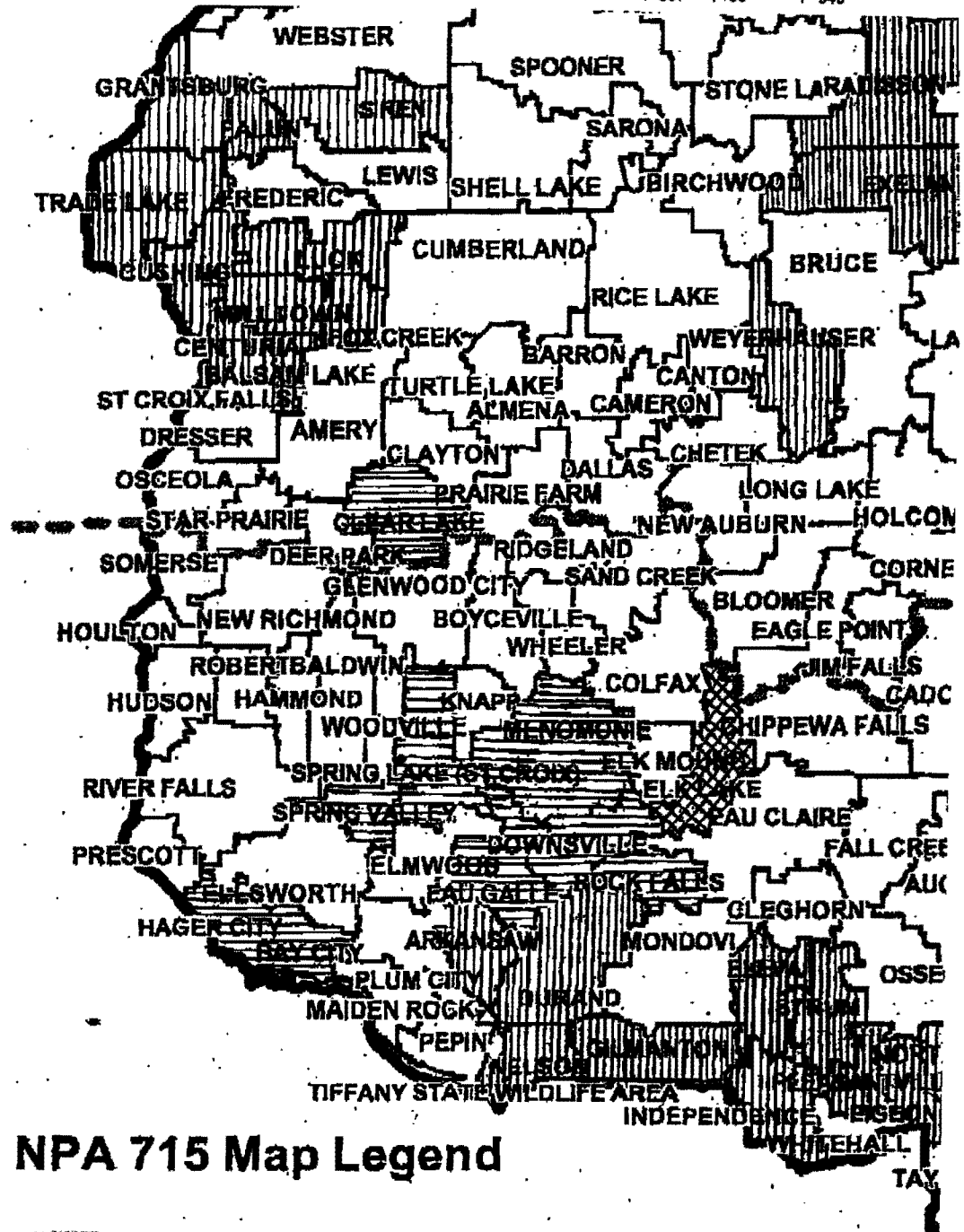
Balsam Lake (for Lakeland Telecom [CLEC])

Centuria (for Lakeland Telecom [CLEC])

Weyerhaeuser

Eleland

Radisson



NPA 715 Map Legend



NPA Boundaries



Rate Center Boundaries



Split Line



WATS Host Exch. & Access Tandem



Remote Exchanges Hosted by WATS



End Office in WATS Access Tandem

Kenworthy, Pamela

From: Trummer, Glori [glori.trummer@tdstelecom.com]
Sent: Tuesday, April 23, 2002 4:53 PM
To: 'pamela.kenworthy@neustar.biz'
Subject: Exhaustion 715 NPA Wisconsin



Trummer, Glori.vcf

Pamela,

TDS Telecom has a number of exchanges that could be involved in the overlay or split of the 715 NPA. It is our opinion that alternative #2 splitting lata 350/352 is the best choice. We understand that this may not be the choice for all, but alternative #2 best fits our needs.

Thanks
Glori

Glori Trummer
Network Services Translations
Specialists II-NPANXX Administrator
608 664-4212
<<Trummer, Glori.vcf>>

Kenworthy, Pamela

From: Colaco, Frank
Sent: Monday, April 29, 2002 3:52 PM
To: 'Dave Carter'
Cc: Kenworthy, Pamela
Subject: RE: relief in Numbering Plan Area 715

Dave:

Thanks very much for your feedback concerning NANPA's relief alternatives for the 715 NPA in Wisconsin. Your input is important to us, however the actual decision making will take place during the relief meeting scheduled for June 4, 2002. Since it is the industry participants at that meeting who will decide the appropriate relief alternative, I would encourage you to participate in the meeting to make your opinion heard. In the meantime, please feel free to contact me if you have any questions or require additional information regarding the NPA relief planning process.

Thanks again,
Frank

-----Original Message-----

From: Dave Carter [mailto:dcarter@cheqtel.com]
Sent: Monday, April 29, 2002 3:36 PM
To: 'Frank.colaco@neustar.biz'
Subject: relief in Numbering Plan Area 715

Frank,

The following are comments from my staff in regards to the 715 area code relief.

From a switching standpoint alternative #2 makes the most sense as this split or border already exists between latas 350 & 352 and would be fairly easy to implement. This option would actually clean up some translations that have to be done now for the (2) 715 latas 352 (ours) & 350 (east WI) as 350 is interstate and takes 6 digit sampling. This would drop that to 3 digit sampling if it were a different Area code. I think we all agree area code overlays are imminent but the longer we can hold off until soft switching and packet networks are in place and it can be deployed nationwide might save us from doing it today and redoing with future platforms.

From a customer's standpoint, especially the older generation, the less impact would be a overlay for cellular and paging customers. This would include migrating all existing cellular and pager customers to the new area code. Since cellular and paging users are primary younger and more technology savvy this would be easier than making older people change to something new. Also, it would have less impact on businesses since most cellular and paging numbers are not advertised.

Dave Carter
General Manager
Chequamegon Telephone Cooperative
P.O. Box 67
43570 Kavanaugh Road
Cable, WI 54821
dcarter@cheqtel.com
DID: 715-798-7147

Main Office: 715-798-3303
Fax: 715-798-3044

January 29, 2007

Gary Evenson - Administrator
Telecom Division
Public Service Commission of Wisconsin

Re: Need to Address the Petition for Approval of the 715 NPA Relief Plan

This is to confirm my recent conversations with Kathy Bakke of your staff that, based on the October 2006 NRUF NPA forecasted exhausts, the WI 715 NPA is within 36 months of its 1Q2010 exhaust and that the PSC needs to consider what relief plan should be used to introduce the new area code. NANPA filed on behalf of the industry the petition for approval of the 715 NPA relief plan on August 12, 2002. The industry consensus of an overlay recommended a nineteen month implementation interval.

The next NRUF NPA exhaust forecast will be available at the end of April. Once this new forecast is published, NANPA has agreed to file with the commission current 715 NPA central office code (NXX) data and updated projected lives of the several relief alternatives the industry reviewed during its planning meeting.

If you have any questions, please give me a call at (805) 520-1945.

Regards,

Joseph R. Cocke
Sr. NPA Relief Planner
NANPA

C: All 715 NPA Code Holders and Other Industry Members (Wisconsin)
C: Kathleen Bakke – PSCW -Staff

May 9, 2007

Via Electronic Filing

Sandra J. Paske
Secretary to the Commission
Public Service Commission of Wisconsin
610 North Whitney Way
Madison, Wisconsin 53707

Re: Investigation of Area Code Relief for the 715 Area Code in
Northern Wisconsin
Case No. 05-TN-100

Dear Ms. Paske:

NeuStar, Inc. ("NeuStar"), as the North American Numbering Plan Administrator ("NANPA"), provides an update on the projected exhaust of the 715 numbering plan area ("NPA") and the projected lives of the NPA relief alternatives previously described in the above-referenced proceeding. This information is submitted to assist the Commission in its consideration of the relief plan that should be used to introduce a new area code in Northern Wisconsin.

Background

On August 12, 2002, NANPA, in its role as the neutral third party NPA relief planner for Wisconsin and on behalf of the Wisconsin telecommunications industry ("Industry"), petitioned the Commission to implement relief for the 715 NPA, which at that time was projected to exhaust during the second quarter of 2005.¹ As explained in the Petition, the Industry reached consensus to recommend to the Commission an all-services distributed overlay (identified in the Petition as Alternative #1) as its first choice for relief for the 715 NPA, and a north-to-south geographic split (identified in the Petition as Alternative #6) in the event the Commission rejects the overlay.

Conservation measures and more efficient mechanisms for allocating numbering resources subsequently were implemented, thus decreasing the demand for numbering resources

¹ See Petition of the North American Numbering Plan Administrator, on Behalf of the Wisconsin Telecommunications Industry, for Approval of NPA Relief Plan for the 715 NPA, Case No. 05-TN-100 (filed Aug. 12, 2002) ("Petition"). As a neutral third party administrator, NANPA has no independent view as to the relief plan ultimately adopted by the Commission.

in the 715 NPA. Accordingly, the projected life of the 715 NPA was extended for several years and there was no immediate need for Commission action on the Petition.

By a letter dated January 29, 2007, NANPA notified the Commission that numbering resources in the 715 NPA had decreased such that the Commission should further consider the relief alternatives and recommendations set forth in the Petition, and stated that NANPA would update the record accordingly after it released newly calculated projected NPA exhaust information.²

Updated Information

On April 26, 2007, NANPA released its April 2007 Number Resource Utilization Forecast) and NPA Exhaust Analysis ("NRUF Report") providing projected exhaust dates for all United States NPAs based upon recent central office code (often referred to as "CO" or "NXX" code) demand forecasts and utilization information supplied by service providers.³ Pursuant to the April 2007 NRUF Report, the 715 NPA is now projected to exhaust in the **fourth quarter of 2009**. As of April 30, 2007, 92 CO codes in the 715 NPA are available for assignment.

In addition, the following table sets forth the projected lives of the NPA relief alternatives as originally calculated in the Petition and as recalculated in May 2007 using current Local Exchange Routing Guide data and current demand projection data supplied by service providers.

	Type of Relief	Original Projected Lives	Updated Projected Lives (May 2007)
Alternative #1	All-Services Overlay	12 Years	22 Years
Alternative #2	Geographic Split	Area A: 9 Years Area B: 17 Years	Area A: 21 Years Area B: 23 Years
Alternative #3	Geographic Split	Area A: 10 Years Area B: 16 Years	Area A: 14 Years Area B: 34 Years
Alternative #4	Geographic Split	Area A: 10 Years Area B: 16 Years	Area A: 17 Years Area B: 27 Years
Alternative #5	Geographic Split	Area A: 11 Years Area B: 14 Years	Area A: 19 Years Area B: 25 Years
Alternative #6	Geographic Split	Area A: 9 Years Area B: 18 Years	Area A: 19 Years Area B: 24 Years

² See Letter from Joseph R. Cocke, Senior Relief Planner, NANPA, to Gary Evenson, Telecommunications Division, Public Service Commission of Wisconsin, Case No. 05-TN-100 (Jan. 29, 2007).

³ April 2007 NRUF (Number Resource Utilization Forecast) and NPA Exhaust Analysis ("NRUF Report"), available at http://www.nanpa.com/reports/reports_nruf.html.

As the table demonstrates, the projected lives of each alternative have been extended as compared to the projected lives originally set forth in the Petition. This is due to the reduced demand for CO codes and various number conservation measures. For example, thousand block number pooling was implemented in the 715 NPA on August 6, 2003. Carriers also must meet certain utilization thresholds before they can receive additional numbering resources in a given rate center. In addition, 60 previously "unavailable" protected and special use NXX codes were made available for assignment in January 2003. For the Commission's convenience, updated maps depicting the NPA relief alternatives originally set forth in the Petition also are attached.

It should be noted that the recalculation of the projected lives of the relief alternatives for the 715 NPA resulted in a difference of 20 years between the updated lives of Area A and Area B for Alternative #3. According to the industry guidelines to which NANPA adheres for relief planning purposes, severe imbalances of more than ten years in NPA lifetimes are to be avoided.⁴ If the Commission chooses Alternative #3 as the method for relief in this case, NANPA is required to notify the Federal Communications Commission so that it may take any action it deems necessary.

If you have any questions regarding this matter, please contact Joseph R. Cocke, Senior NPA Relief Planner, at 805-520-1945 or joe.cocke@neustar.biz.

Respectfully submitted,

/s/ Jordan Goldstein

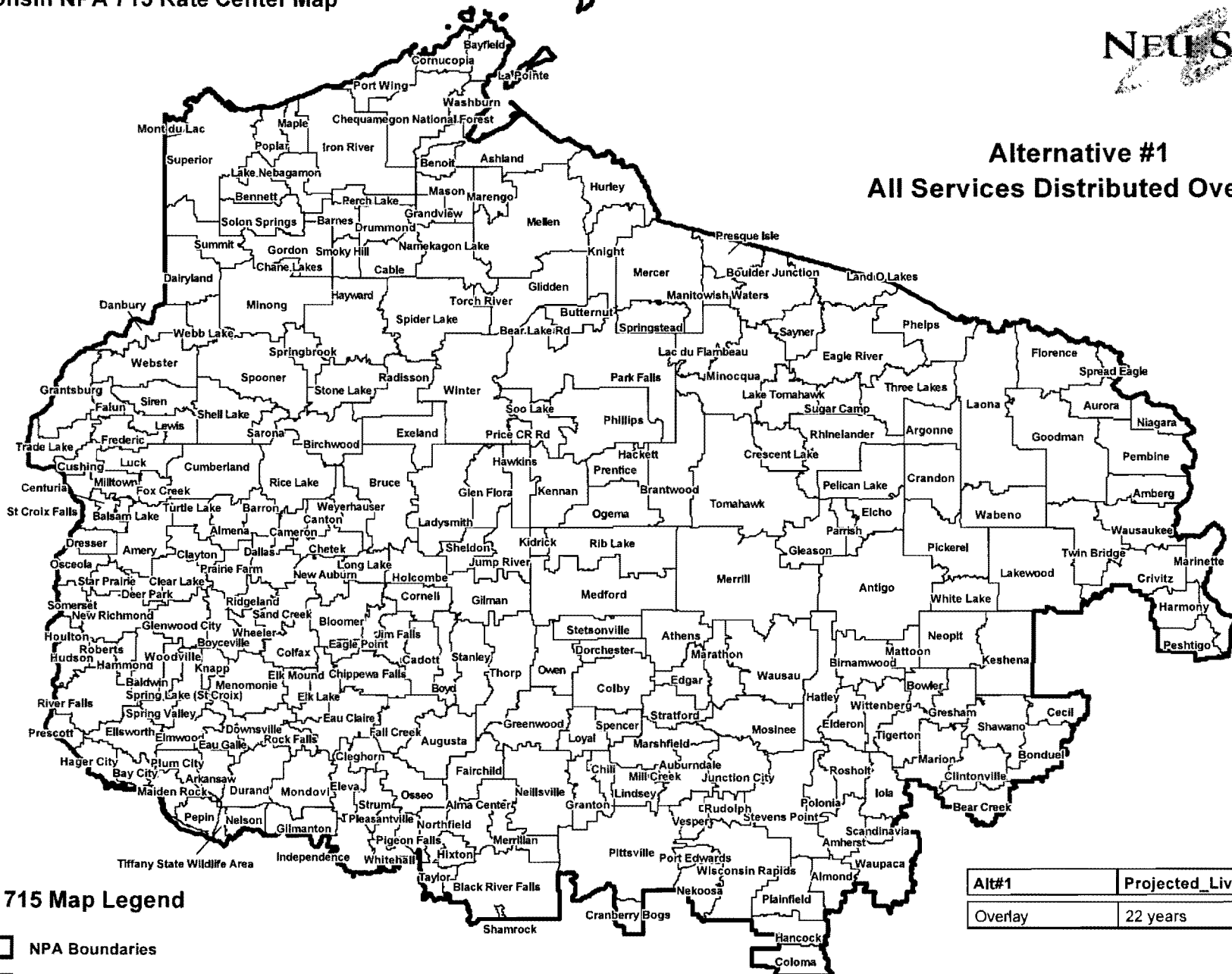
Jordan Goldstein
Vice President, Federal Regulatory
NeuStar, Inc.
North American Numbering Plan Administrator
2000 M Street, N.W., Suite 600
Washington, D.C. 20036
(202) 533-2913 (phone)
(202) 533-2972 (fax)

cc: All 715 NPA Code Holders and Other Industry Members
Gary Evenson, Administrator, Telecommunications Division
Kathleen Bakke, Commission Staff

⁴ See NPA Code Relief Planning and Notification Guidelines, § 5.0(g), (ATIS-0300061, Jan. 19, 2007) ("NPA Relief Planning Guidelines"). The NPA Relief Planning Guidelines assist NANPA, the Industry and regulatory authorities within a particular geographic NPA in the planning and execution of relief efforts. The NPA Relief Planning Guidelines can be accessed on the ATIS website located at www.atis.org/docstore/default.aspx.

Wisconsin NPA 715 Rate Center Map

NEU STAR

Public Service Commission of Wisconsin
RECEIVED: 05/09/07, 4:01:59 PMAlternative #1
All Services Distributed Overlay

NEUE STAR

LATA 342

AREA A

LATA 352

AREA B

LATA 350

LATA 354

Produced by CDS Business Mapping, LLC 04/2007

Wisconsin NPA 715 Rate Center Map

NEW STAR

Alternative #3 NPA Split



NPA 715 Map Legend

- NPA Boundaries
- Rate Center Boundaries

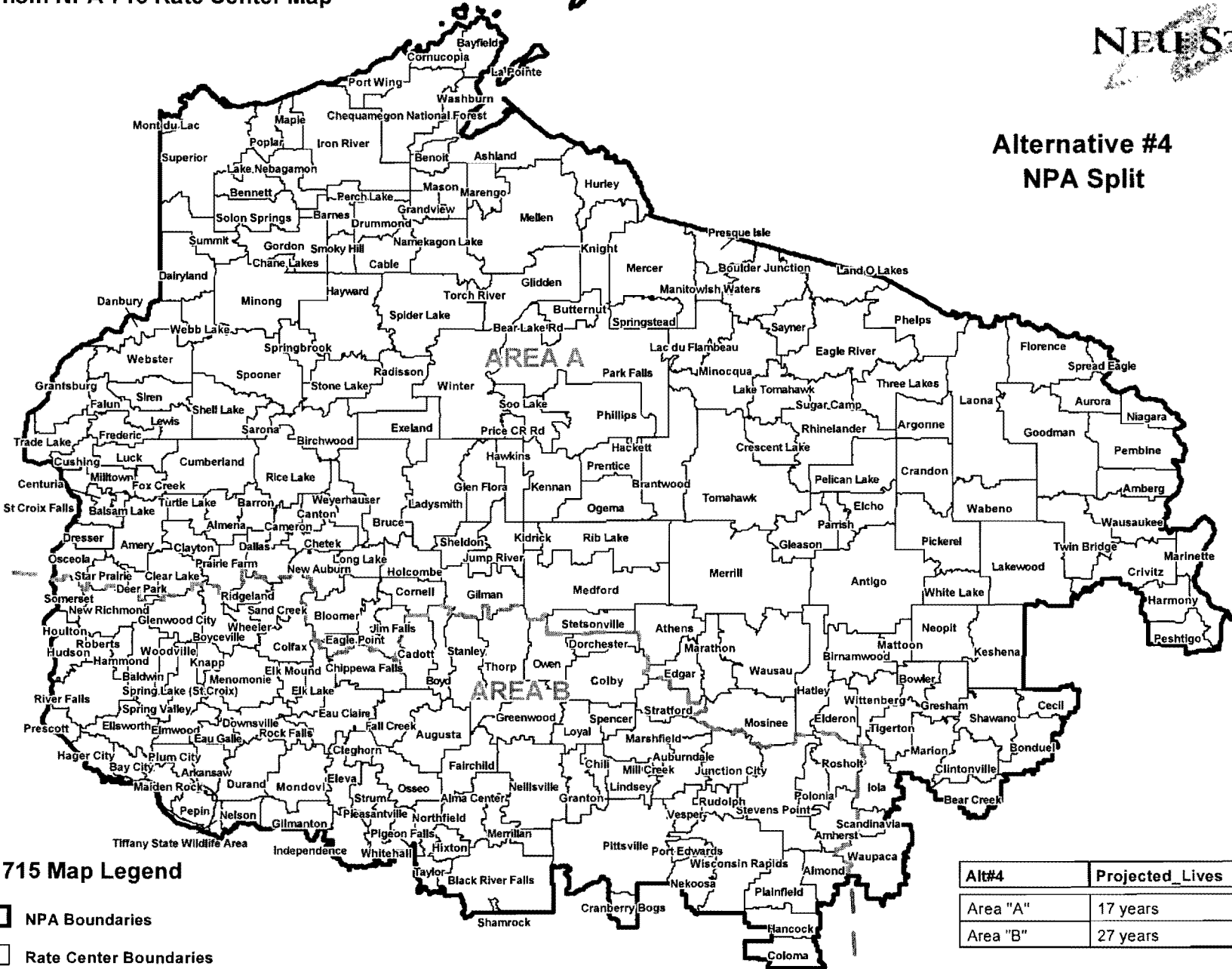
Split Line

Alt#3	Projected_Lives
Area "A"	14 years
Area "B"	34 years

Wisconsin NPA 715 Rate Center Map

NEU STAR

Alternative #4 NPA Split



NPA 715 Map Legend

- NPA Boundaries
- Rate Center Boundaries

Split Line

Alt#4	Projected_Lives
Area "A"	17 years
Area "B"	27 years



D

NEU STA

Alternative #5 NPA Split



NPA 715 Map Legend

-  **NPA Boundaries**
-  **Rate Center Boundaries**

Split Line

Alt#5	Projected_Lives
Area "A"	19 years
Area "B"	25 years



Wisconsin NPA 715 Rate Center Map

NEU STAR

Alternative #6 NPA Split



NPA 715 Map Legend

-  NPA Boundaries
-  Rate Center Boundaries

 Split Line

Alt#6	Projected_Lives
Area "A"	19 years
Area "B"	24 years

920 PETITION

⁴ In order to plan for the introduction of new area codes, NANPA and the Industry utilize the NPA Code Relief Planning & Notification Guidelines (ATIS-0300061, Jan. 19, 2007) (“NPA Relief Planning Guidelines”). The NPA Relief Planning Guidelines assist NANPA, the Industry and Regulatory Authorities within a particular geographic NPA in the planning and execution of relief efforts. The NPA Relief Planning Guidelines can be accessed on the ATIS website located at <http://www.atis.org/docstore/default.aspx>.

office codes (often referred to as “CO” or “NXX” codes) for the 920 NPA will exhaust during the second quarter of 2010.⁵ In support of this petition and on behalf of the Industry, NANPA submits the following:

I. BACKGROUND

A. Industry Relief Efforts

Relief efforts regarding the 920 NPA date back to 1999. NeuStar released in 1999 a Central Office Code Utilization Survey (“COCUS”) projection for CO code utilization – now called the NRUF (Number Resource Utilization Forecast) and NPA Exhaust Analysis (“NRUF Report”) – indicating that the 920 NPA would exhaust during the first quarter of 2001. NANPA notified the Industry members and the Commission on August 18, 1999 that NPA relief planning needed to be addressed. The Industry met on September 29, 1999 in Green Bay, Wisconsin to discuss various relief alternatives.⁶ Pursuant to the NPA Relief Planning Guidelines, NANPA distributed an Initial Planning Document (“IPD”) to the Industry prior to the relief planning meeting.⁷ The IPD contained descriptions, maps, general facts and assumptions, and the projected lives of one all-services distributed overlay relief alternative and three geographic split alternatives. No additional alternatives were proposed by Industry members prior to or at the meeting. As further discussed below, the Industry reached consensus at the September 29 meeting to recommend the all-service distributed overlay as its preferred means for relief for the 920 NPA, and a two-way southwest to northeast geographic split through the midsection of the

⁵ April 2007 NRUF (Number Resource Utilization Forecast) and NPA Exhaust Analysis (“NRUF Report”), available at http://www.nanpa.com/reports/reports_nruf.html.

⁶ A copy of the minutes of the September 29, 1999 Industry relief meeting, including a list of attendees, is attached as Exhibit A (“September 29 Meeting Minutes”).

⁷ A copy of the IPD is attached to Exhibit A.

920 NPA if the Commission decides to adopt a geographic split rather than the recommended overlay.

After reaching consensus on the NPA relief plans to recommend to the Commission, however, the Industry discussed the recent decline in demand for CO codes and certain proposed number conservation measures, such as an Industry investigation into protected (unassignable) CO codes, reclamation of unused CO codes from service providers, implementation of thousands block number pooling and rate center consolidation that may extend the life of the 920 NPA beyond the projected exhaust of first quarter 2001. The Industry decided to delay filing the instant petition for relief until the supply of available CO codes in the 920 NPA reached less than 180 CO codes or the projected exhaust was less than 24 months away.⁸ Indeed, due to the decline in demand for CO codes and the expectation of number pooling, the projected life of the 920 NPA was extended by several years.

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⁸ See September 29 Meeting Minutes at 3. The Commission was notified of the Industry's decision to delay filing the petition on October 28, 1999. See Letter from Sandy Tokarek, NANPA, to Gary Evenson, Public Service Commission of Wisconsin (Oct. 28, 1999), attached hereto as Exhibit B.

⁹ Copies of the minutes of the February 6, 2003; June 26, 2003; May 26, 2004; November 17, 2004; November 22, 2005; and May 19, 2006 Industry relief meetings are attached hereto as Exhibits C through H.

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B. Proposed Relief Alternatives And Industry Consensus Decision

As noted above, the Industry considered four NPA relief alternatives at the September 29, 1999 meeting. Those alternatives, reflecting the revised projected lives of each alternative, are:¹³

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¹² A copy of the minutes from the June 7, 2007 Industry meeting are attached hereto as Exhibit K.

¹³ The projected lives of the alternatives set forth in the IPD were calculated in accordance with trends in demand that existed and were reported at the time the IPD was created. Number conservation measures and economic conditions have resulted in decreased demand. Therefore, the projected lives of the four alternatives have changed substantially since the Industry reached consensus on an NPA relief alternative.

Pursuant to Industry guidelines, neither NANPA nor the Industry can change an Industry consensus decision regarding NPA relief, but, for the use and convenience of the Commission, the descriptions of the alternatives reflect the updated projected lives of the relief alternatives based upon the most recent information available.

- Alternative #1 – All-Services Distributed Overlay: A new NPA code would be assigned to the same geographic area as the existing 920 NPA. Alternative #1 has a projected life of 24 years.
- Alternative #2 – Geographic Split: The proposed split boundary line travels along the LATA lines of LATAs 350 and 356 in a east-to-west and southwest direction just south of Lake Winnebago starting between Kewaunee and Tisch Mills rate centers, continues between the Tisch Mills and Denmark rate centers, then along the northern sides of the Whitelaw, Reedsville and Brillion rate centers, between the Sherwood and Hilbert rate centers, between the Stockbridge and Chilton rate centers, along the western side of the Chilton and Johnsbury rate centers, then follows the southern portion of Lake Winnebago along the northern side of the Fond du Lac and Pickett rate centers, and then along the southern side of the Rippon, Green Lake and Princeton rate centers to the edge of the NPA. The proposed split creates two geographic areas – the northern area is referred to as “Area A” and the southern area is referred to as “Area B.” Area A has a projected NPA life of 20 years to exhaust and Area B has a projected NPA life of 30 years to exhaust.
- Alternative #3 – Geographic Split: The proposed split boundary line follows a north-to-south direction starting between the Pulaski and Seymour rate centers, continues along the eastern side of the Seymour rate center, along the eastern side of the Little Chute, Kaukauna and Appleton rate centers, along the eastern shore of Lake Winnebago following the western sides of the Sherwood, Stockbridge, Chilton and Johnsbury rate centers, between the Mount Calvary and Fond du Lac rate centers, and then south on the western side of the Greenbush and Cascade rate centers to the edge of the NPA. The proposed split creates two geographic areas – the western area is referred to as “Area A” and the eastern area is referred to as “Area

B.” Area A has a projected NPA life of 20 years to exhaust and Area B has a projected NPA life of 29 years to exhaust.

- Alternative #4 – Geographic Split: The proposed split boundary line travels in a north-to-south direction starting along the western and southern side of the Seymour rate center, continues along the eastern edge of the Little Chute, Kaukauna and Sherwood rate centers, turns in a southerly direction around the Sherwood rate center, around the western shore of Lake Winnebago, along the southern sides of the Oshkosh, Pickett and Ripon rate centers, along the western side of the Brandon rate center, then along the southern side of the Waupun, Oakfield and Lomira rate centers to the edge of the NPA. The proposed split creates two geographic areas – the western area is referred to as “Area A” and the eastern area is referred to as “Area B.” Area A has a projected NPA life of 28 years to exhaust and Area B has a projected NPA life of 22 years to exhaust.

At the September 29, 1999 meeting, the participants discussed the attributes of the relief alternatives and reached consensus to recommend to the Commission Alternative #1, the all-services distributed overlay plan, as their preferred method of relief for the 920 NPA. The Industry set forth the following reasons for recommending the all-services overlay to the Commission:

- An all-services distributed overlay can be implemented in a shorter interval than a geographic split;
- An overlay does not reduce the geographic size of the NPA;
- Subsequent relief likely will be another overlay;

- Overlays avoid the need for a time consuming and politically complicated decision-making process to determine the location of the split boundary and which area will retain the existing NPA;
- No existing customer telephone numbers will be changed; and
- An overlay minimizes customers' need to change stationery, business cards and advertising.

The Industry participants reached consensus to recommend Alternative #2, a geographic split, should the Commission reject the recommended all-services distributed overlay relief plan. The Industry members reached consensus to eliminate from consideration the remaining alternatives, Alternatives #3 and #4, because the split boundaries for these alternatives did not follow LATA boundaries, thereby dividing local calling areas and making customer education more difficult. Industry members also noted that previously implemented geographic splits have not extended the life of affected NPAs for as long as originally projected.

II. DESCRIPTION OF THE RECOMMENDED RELIEF PLANS

Alternative #1, the all-services distributed overlay, would superimpose a new NPA over the same geographic area covered by the existing 920 NPA. All existing customers would retain the 920 area code and would not have to change their telephone numbers. Consistent with FCC regulations, the relief plan would require 10-digit dialing for all local calls within and between the 920 NPA and the new NPA.¹⁴ When the 920 NPA exhausts, all CO code assignments will be made from the new overlay area code. As set forth in the previous section, the projected life of Alternative #1 is now 24 years.

Alternative #2, a geographic split, would split the 920 NPA into two NPAs with the dividing boundary separating the 920 NPA into an eastern and western half. A geographic split

¹⁴ 47 C.F.R. §52.19(c)(3)(ii).

requires customers located within the area receiving the new area code to change their telephone numbers. All local calls within the home NPA will continue to use seven-digit dialing. The projected lives of the two NPAs created by Alternative #2 are now 20 and 30 years. The Industry also decided not to develop a relief implementation plan until the Commission issues an order for relief.

III. CONCLUSION

The Industry has determined the need to initiate relief efforts for the 920 NPA in Wisconsin to prevent the exhaust of numbering resources. The Industry respectfully requests that the Commission issue an order approving either the Industry's preferred choice for relief for the 920 NPA, an all-services distributed overlay, or to the extent the Commission does not adopt the recommended overlay, the two-way geographic split identified as Alternative #2 above.

Respectfully submitted,

/s/_____
Kimberly Wheeler Miller
Director, Regulatory Law & Public Policy
NeuStar, Inc.
North American Numbering Plan Administrator
2000 M Street, N.W., Suite 600
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Joseph R. Cocke
Senior NPA Relief Planner
North American Numbering Plan Administrator
NeuStar, Inc.
1445 Los Angeles Ave., Suite 301-N
Simi Valley, CA 93065
(805) 520-1945
joe.cocke@neustar.biz

June 19, 2007

⁴ In order to plan for the introduction of new area codes, NANPA and the Industry utilize the NPA Code Relief Planning & Notification Guidelines (ATIS-0300061, Jan. 19, 2007) (“NPA Relief Planning Guidelines”). The NPA Relief Planning Guidelines assist NANPA, the Industry and Regulatory Authorities within a particular geographic NPA in the planning and execution of relief efforts. The NPA Relief Planning Guidelines can be accessed on the ATIS website located at <http://www.atis.org/docstore/default.aspx>.

office codes (often referred to as “CO” or “NXX” codes) for the 920 NPA will exhaust during the second quarter of 2010.⁵ In support of this petition and on behalf of the Industry, NANPA submits the following:

I. BACKGROUND

A. Industry Relief Efforts

Relief efforts regarding the 920 NPA date back to 1999. NeuStar released in 1999 a Central Office Code Utilization Survey (“COCUS”) projection for CO code utilization – now called the NRUF (Number Resource Utilization Forecast) and NPA Exhaust Analysis (“NRUF Report”) – indicating that the 920 NPA would exhaust during the first quarter of 2001. NANPA notified the Industry members and the Commission on August 18, 1999 that NPA relief planning needed to be addressed. The Industry met on September 29, 1999 in Green Bay, Wisconsin to discuss various relief alternatives.⁶ Pursuant to the NPA Relief Planning Guidelines, NANPA distributed an Initial Planning Document (“IPD”) to the Industry prior to the relief planning meeting.⁷ The IPD contained descriptions, maps, general facts and assumptions, and the projected lives of one all-services distributed overlay relief alternative and three geographic split alternatives. No additional alternatives were proposed by Industry members prior to or at the meeting. As further discussed below, the Industry reached consensus at the September 29 meeting to recommend the all-service distributed overlay as its preferred means for relief for the 920 NPA, and a two-way southwest to northeast geographic split through the midsection of the

⁵ April 2007 NRUF (Number Resource Utilization Forecast) and NPA Exhaust Analysis (“NRUF Report”), available at http://www.nanpa.com/reports/reports_nruf.html.

⁶ A copy of the minutes of the September 29, 1999 Industry relief meeting, including a list of attendees, is attached as Exhibit A (“September 29 Meeting Minutes”).

⁷ A copy of the IPD is attached to Exhibit A.

920 NPA if the Commission decides to adopt a geographic split rather than the recommended overlay.

After reaching consensus on the NPA relief plans to recommend to the Commission, however, the Industry discussed the recent decline in demand for CO codes and certain proposed number conservation measures, such as an Industry investigation into protected (unassignable) CO codes, reclamation of unused CO codes from service providers, implementation of thousands block number pooling and rate center consolidation that may extend the life of the 920 NPA beyond the projected exhaust of first quarter 2001. The Industry decided to delay filing the instant petition for relief until the supply of available CO codes in the 920 NPA reached less than 180 CO codes or the projected exhaust was less than 24 months away.⁸ Indeed, due to the decline in demand for CO codes and the expectation of number pooling, the projected life of the 920 NPA was extended by several years.

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Respectfully submitted,

/s/

Kimberly Wheeler Miller
Director, Regulatory Law & Public Policy
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June 19, 2007

PSC REF#:77588

Public Service Commission of Wisconsin
RECEIVED: 06/19/07, 3:22:15 PM

EXHIBIT A

Lockheed Martin IMS
Communications Industry Services
1133 15th Street, N.W. Washington, D.C. 20005



November 1, 1999

To: Wisconsin 920 NPA Code Holders & Other Industry Members

Re: Revised and Approved Minutes for the Initial NPA Relief Planning Meeting in the 920 NPA

Attached are the final minutes for the initial NPA relief planning meeting held in Green Bay on September 29 as revised and approved on a conference call held Wednesday, October 27, 1999.

Please give me a call at 512-996-8757, or e-mail me at linda.hymans@nanpa.com, if you have any questions or require additional information. You may also contact Sandy Tokarek, Senior NPA Relief Planner, at 401-821-7761.

A handwritten signature in cursive script, reading "Linda Hymans".

Linda Hymans
NPA Relief Planner – Central Region
NANPA

**Minutes
Initial Relief Planning for the Wisconsin 920 NPA
Green Bay, Wisconsin
September 29, 1999**

ATTENDANCE

A list of meeting attendees can be found at the end of this document.

WELCOME AND INTRODUCTIONS

Ms. Sandy Tokarek, Lockheed Martin NANPA Senior NPA Relief Planner, introduced herself and Ms. Linda Hymans, NANPA NPA Relief Planner and attendees introduced themselves. Ms. Tokarek outlined the objectives of the meeting and explained the policy regarding possible media presence.

NANPA TRANSITION UPDATE

Ms. Tokarek gave a brief overview of the events since Lockheed Martin IMS was selected as the NANPA, and highlights of the CO Code Administration and NPA Relief Planning. Effective March 31, 1999, Lockheed Martin NANPA became responsible for all NPA relief planning activities.

REVIEW INDUSTRY GUIDELINES

Ms. Tokarek reviewed various sections of the NPA Code Relief Planning and Notification Guidelines (INC97-0404-016 Issued 4/4/97). You may download this document from the ATIS web site (www.atis.org/atis/clc/inc/incdocs.htm). Ms. Tokarek stated that the ATIS (Alliance for Telecommunications Solutions) approved industry consensus process will be followed. She explained the consensus process and how consensus is determined.

INITIAL PLANNING DOCUMENT

Ms. Hymans reviewed the Initial Planning Document (IPD) model and the IPD and there was ample discussion. The IPD, see attachment #1, includes four alternatives: one all services overlay and three single geographic splits.

DISCUSSION OF RELIEF ALTERNATIVES

Ms. Hymans presented the NPA relief alternatives in the IPD and explained the assumptions used in the model. She explained that the IPD alternatives are determined using NANPA projections based on the available 1999 Central Office Code Utilization Study (COCUS), historical NXX assignment data, the exhaust of the NPA and a potential growth factor.

Public Service Commission of Wisconsin (PSCW) staff asked about the possibility of a boundary realignment and/or a three-way split option as those options were reviewed in a previous Wisconsin relief planning proceeding. It was explained that NANPA staff would work up any other alternatives if requested. No other alternatives were formally suggested.

There was discussion about 10-digit dialing in an overlay and it was noted that the Illinois Commerce Commission requested 10-digit dialing waiver from the Federal Communications Commission (FCC) until all NPAs are implemented.

Discussion took place about whether to recommend more than one option, possibly ranking them.

Consensus was first reached to eliminate Alternative #3 – East of Lake Winnebago Geographic split and Alternative #4 – West of Lake Winnebago Geographic split for the following reasons:

- Breaks up some local calling areas.
- Easier to educate customers if the line is along LATA boundaries.
- Previous splits did not last as long as projected.

RECOMMENDED RELIEF ALTERNATIVE

Consensus was reached to recommend the all-services distributed overlay alternative.

Reasons for proposing an overlay to the PSCW:

- Implementation can be done in a shorter timeframe.
- With an overlay there will be multiple area codes for each geographic area. And it will end further shrinking of the geographic size of the area code.
- Subsequent relief will likely be another overlay.
- Overlays avoid the need for public and political involvement concerning split boundaries and which side should retain the old area code.
- An overlay will not require any customers to change their area code.
- Stationery, business cards and advertising does not need to be updated unless they only contain seven-digit telephone numbers and need to add the area code.

It was determined that a dialing pattern is in place for geographic split through Wisconsin State Telephone Association (WSTA) and that an overlay dialing pattern was developed for the industry recommendation for the 414/262 relief. A copy of that dialing plan was located by Ms. Tokarek and can be found as Attachment 1 to this document.

Consensus was reached to propose that Alternative #2 be recommended if the PSCW does not care for the overlay with Area A keeping the 920 NPA.

AT&T proposed that wireless Type II be grandfathered in the 920 NPA. Consensus was not reached to agree with this proposal. Another proposal was made to extend wireless permissive for up to two years. Consensus was reached to approve that proposal. AT&T requested to be in the record as not opposed to the extended permissive but preferring the grandfathering proposal.

Discussion regarding set aside codes for new service providers in an overlay was tabled after some deliberation. PSCW stated that there are 6 or less CLEC applications pending statewide before the PSCW and there is no way to know whether or not they will serve the 920 NPA.

DISCUSSION OF NUMBER CONSERVATION MEASURES

Discussion took place about the PSCW petition to the FCC for number conservation measures and the impacts on code consumption due to the elimination of wireless reverse billing.

It was determined that the PSCW has an active number conservation proceeding.

AT&T, Ameritech, PrimeCo, GTE and Northeast Telephone volunteered to participate in a number conservation team to establish a task force to review the possibility of pursuing the following number conservation measures:

1. Investigation into protected codes.
2. Write to codeholders to ask if they are using their codes/reclamation.
3. Study of 920 NPA for number pooling.
4. Rate center consolidation.

A brief meeting was held after the relief meeting and the PSCW staff members indicated that they would head the number conservation task force in accordance to the open docket.

A wireless service provider expressed concern that LATA-wide code assignment/reverse billing is no longer offered and because of that service providers must obtain NXX codes in every rate center which is causing premature exhaust of the NPA. It was determined that not every wireless provider has codes in every rate center and this is not as much a cellular problem as a paging problem. After discussion it was determined that this was not a number conservation issue but a matter better handled in other industry fora.

SUBMISSION TO THE WISCONSIN PUBLIC SERVICE COMMISSION

The industry reached consensus that NANPA should forward the results of the 920 NPA relief meeting to the PSCW in the form of a letter. The filing of the industry recommendation for a proposed relief plan will be delayed pending further review of NXX code assignments, the outcome of the PSCW petition to the FCC and the efforts of the number conservation task force. NANPA will advise the PSCW that the industry reached consensus to provide relief for the 920 NPA in the form of an all services distributed overlay but does not believe any action needs to begin until the number of available NXX codes drops to a trigger point of either 180 codes left in the NPA or 6 months prior to the need to start relief planning (24 months to exhaust – 6 months plus 18 months for proceeding). If the PSCW does not agree with the overlay, the industry recommends Alternative #2 with Area A keeping the 920 NPA. It was requested that the recommendation also provide information about how the exhaust dates for the relief alternatives were determined.

IMPLEMENTATION SCHEDULE

The industry tabled the implementation schedule pending the outcome of the PSCW petition to the FCC and review of future NPA exhaust.

Ms. Tokarek discussed the NANPA media interface, Rebecca Barnhart, and explained how industry members may want to direct media questions relating to 920 NPA Relief to Ms. Barnhart to avoid any confusion.

APPROVAL OF MINUTES

It was the consensus of the industry that the draft minutes and recommendation will be distributed for review by October 20, 1999 and that a conference call will take place on Wednesday, October 27, 1999, at 10AM Central to review and approve the documents. The dial in number is 612-335-3420 Access Code 2973* (30 ports for 2 hours). The notification letter about the industry meeting will be sent to the PSCW by November 3, 1999.

ATTENDEES

COMPANY	NAME
Airadigm Communications	Bob Schultze
American Cellular Corp.	Patrick Morrissey
American Cellular Corp.	Tom Spears
Ameritech	Dawn Wantuch
Ameritech	Michael Klasen
Ameritech Cellular & Paging	Lori Swarthout
AT&T	Anne Henderson
Bayland Telephone	Roger Hermson
Century Tel	Gene Kempf
GTE	Ken Madrzak
GTE	Mary Weedman
JSM Tele-Page Inc.	Jeff Sohn
Manawa Telephone Co.	Tom Squires
Manawa Telephone Co.	Vern Josie
Nextel	Michael Stern
New Cell Inc.	Dave Kosmider
Northeast Telephone Co.	Cheryl Barnes
Northeast Telephone Co.	Larry L. Lueck
PrimeCo Personal Communications	Dana Smith
Public Service Commission of Wisconsin	Gary Evenson
Public Service Commission of Wisconsin	Murugan Kollengode
TDS Telecom	Don Bengel
TDS Telecom	James Walizer
TDS Telecom	Jeanne Schlitz
TDS Telecom	Mike Vanden Elsen
Time Warner Telecom	Tom Frank
U S Cellular	Kim Haas
WSTA Wisconsin State Telecom. Assn.	Kathleen Thompson

ATTACHMENT 1

REVISED WISCONSIN DIALING PLAN

TYPE OF CALL	HOME NPA (HNPA) 608/715	HOME NPA (HNPA) 920/414	FOREIGN NPA (FNPA) 608/715	FOREIGN NPA (FNPA) 920/414
LOCAL & EAS				
Present	7 Digits	7 Digits	7 Digits	7 Digits
Recommended	7 Digits	7 Digits	1+10 Digits	1+10 Digits
Allowable	None	None	None	None
LEC Optional	1+10 Digits	1+10 Digits	7/10 Digits	7/10 Digits **
ECC				
Recommended	7 Digits	7 Digits	1+10 Digits	1+10 Digits
Allowable	1+10 Digits	None	None	None
LEC Optional	1+10 Digits	1+10 Digits	7/10 Digits	7/10 Digits **
TOLL				
Present	1+10 Digits	1+10 Digits	1+10 Digits	1+10 Digits
Recommended	1+10 Digits	1+10 Digits	1+10 Digits	1+10 Digits
10XXX LOCAL				
Present	10XXX/101XXXX+ 7 Digits	10XXX/101XXXX+ 7 Digits	10XXX/101XXXX+ 10 Digits	10XXX/101XXXX+ 10 Digits
Recommended	10XXX/101XXXX+ 1+10 Digits	10XXX/101XXXX+ 1+10 Digits	10XXX/101XXXX+ 1+10 Digits	10XXX/101XXXX+ 1+10 Digits
Allowable	10XXX/101XXXX+ 1+10 Digits	10XXX/101XXXX+ 1+10 Digits	10XXX/101XXXX+ 1+10 Digits	10XXX/101XXXX+ 1+10 Digits
LEC Optional	10XXX/101XXXX+ 7/10 Digits	10XXX/101XXXX+ 7/10 Digits	10XXX/101XXXX+ 10 Digits	10XXX/101XXXX+ 10 Digits
10XXX ECC				
Recommended	10XXX/101XXXX+ 7 Digits	10XXX/101XXXX+ 7 Digits	10XXX/101XXXX+ 1+10 Digits	10XXX/101XXXX+ 1+10 Digits
Allowable	10XXX/101XXXX+ 1+10 Digits	10XXX/101XXXX+ 1+10 Digits	10XXX/101XXXX+ 1+10 Digits	10XXX/101XXXX+ 1+10 Digits
LEC Optional	10XXX/101XXXX+ 10 Digits	10XXX/101XXXX+ 10 Digits	X/101XXXX+ 10 Digits	10XXX/101XXXX+ 10 Digits
10XXX TOLL				
Present	10XXX/101XXXX+ 1+10 Digits	10XXX/101XXXX+ 1+10 Digits	10XXX/101XXXX+ 1+10 Digits	10XXX/101XXXX+ 1+10 Digits
Recommended	10XXX/101XXXX+ 1+10 Digits	10XXX/101XXXX+ 1+10 Digits	10XXX/101XXXX+ 1+10 Digits	10XXX/101XXXX+ 1+10 Digits
OPR. ASSISTED				
Present	0- or 0+10 Digits	0- or 0+10 Digits	0- or 0+10 Digits	0- or 0+10 Digits
Recommended	0- or 0+10 Digits	0- or 0+10 Digits	0- or 0+10 Digits	0- or 0+10 Digits
OPR. ASSISTED IC				
Present	10XXX/101XXXX+ 0+10 Digits	10XXX/101XXXX+ 0+10 Digits	10XXX/101XXXX+ 0+10 Digits	10XXX/101XXXX+ 0+10 Digits
Recommended	10XXX/101XXXX+ 0+10 Digits	10XXX/101XXXX+ 0+10 Digits	10XXX/101XXXX+ 0+10 Digits	10XXX/101XXXX+ 0+10 Digits
INFORMATION				
Present	1+411 or 1+NPA+555-1212	1+411 or 1+NPA+555-1212	1+NPA+555-1212	1+NPA+555-1212
Recommended	555-1212	555-12121	+NPA+555-1212	1+NPA+555-1212
Allowable	411 or 1+NPA+555-1212	411 or 1+NPA+555-1212	None	None
LEC Optional	1+411	1+411		
**NOTE: Areas along the 920/414 split line will dial 10 digits for EAS and ECC calls. Areas along the edge of the 920/414 areas will dial 7 digits if there is 7 digit dialing presently in place.				

PRESENT: Defined as existing dialing requirements**RECOMMENDED:** The dialing plan recommended to be implemented. This should appear in directories.**ALLOWABLE:** This allows customers to have more than one dialing option, and it eliminates customer confusion when traveling throughout the state.

ATTACHMENT 1

LEC OPTIONAL: This option provides for company specific dialing requirements, implemented at the option of the company or due to technical constraints. The dialing plan may not be recognized statewide, and may only be recognized for those customers in that company's serving territory.

PSC REF#:77590

Public Service Commission of Wisconsin
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EXHIBIT B

Lockheed Martin IMS
Communications Industry Services
1133 15th Street, N.W. Washington, D.C. 20005
October 28, 1999



Mr. Gary Evenson
Assistant Administrator
Telecommunication Division
Public Service Commission of Wisconsin
610 N. Whitney Way, P.O. Box 7854
Madison, Wisconsin 53707-7854

Re: NPA Relief Planning for the 920 NPA

Dear Mr. Evenson:

Lockheed Martin IMS North American Numbering Plan Administration (NANPA) is responsible for initiating NPA relief planning in areas within the US in sufficient time to prevent the exhaust of numbering resources before relief is needed. Based on the latest COCUS (CO Code Utilization Survey) results, the 920 NPA in Wisconsin is currently projected to exhaust in the first quarter of 2001. As of September 30, there are approximately 260 codes available for assignment in the 920 NPA.

In accordance with the NPA Code Relief Planning & Notification Guidelines (INC 97-0404-016), NANPA hosted an industry meeting on September 29, 1999 to discuss relief planning alternatives and possible number conservation measures in the 920 NPA. After review of the Initial Planning Document (IPD), it was the consensus of the industry to recommend an all-services distributed overlay as the relief method for the 920 NPA.

However, because actual requests for central office (NXX) codes have declined during the last quarter and the Public Service Commission of Wisconsin (PSCW) has a petition pending before the Federal Communications Commission (FCC) for approval to implement number conservation measures, the industry has requested that NANPA delay the filing of a recommendation until certain events have occurred. In this regard, NANPA will file the industry's recommendation for relief of the 920 NPA when the supply of available CO codes has reached 180 or less NXX codes, or there is a projected 24 months or less before the 920 NPA exhausts, whichever occurs first. NANPA will monitor the monthly NXX code requests for any significant changes in the current assignment trend.

Please contact me at 401-821-7761 if you have any questions or require additional information.

Sincerely,

A handwritten signature in cursive script that reads "Sandy Tokarek".

Sandy Tokarek
Senior Relief Planner - Central Region
Lockheed Martin IMS, NANPA

cc: Jim Deak, Lockheed Martin IMS, NANPA

PSC REF#:77591

Public Service Commission of Wisconsin
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EXHIBIT C

March 11, 2003

To: 920 NPA (Wisconsin) Code Holders and Other Industry Members

Re: Final Meeting Minutes and Revised NPA Relief Filing

Attached, for your records, are the final industry approved minutes resulting from the meeting that was held February 6, 2003 to review and approve the petition for relief of the 920 NPA. Included with this distribution is the draft relief petition, which reflects revisions made during the meeting.

Questions concerning this distribution can be directed to me on 973-740-9100, or via email at frank.colaco@neustar.biz.



Frank Colaco
Senior NPA Relief Planner – Central Region NANPA

Attachment

**920 NPA – WISCONSIN
RELIEF PETITION REVIEW AND APPROVAL
FEBRUARY 6, 2003
VIA CONFERENCE CALL**

WELCOME AND INTRODUCTIONS

Frank Colaco, Senior NPA Relief Planner, NANPA welcomed everyone and asked the conference call participants to introduce themselves and identify the companies they represented. See Attachment # 1 for the names of those who attended the industry conference call.

CONSENSUS, MINUTES AND STATEMENTS FOR THE RECORD

Mr. Colaco stated that the ATIS (Alliance for Telecommunications Industry Solutions) approved industry consensus process would be followed. He reviewed the consensus process and explained how consensus is determined. In addition, Mr. Colaco stated that meeting minutes would be recorded and comprised of consensus agreements, and that issues not captured by consensus could be expressed in the form of a Statement for the Record, which could be conveyed at any point during the meeting.

Additionally, Mr. Colaco explained that the following guidelines would apply in determining consensus during a conference call meeting: NANPA will proceed with the conference call based on those who announced themselves at the start of the call. It is at that time that it will be determined whether enough companies, industry segments, etc. are on the call to warrant continuing. During the course of the meeting some participants may, for any reason, choose to drop off the call. Regardless, this will not influence the meeting proceeding according to the agenda. Silence on the part of the participants will be considered agreement with a proposal, based on those on the call at the time consensus is called. It will not be necessary to determine who is still on the call, when each consensus question is called. If it appears that consensus will be difficult to achieve on a given issue, or if an issue becomes controversial, NANPA may opt to poll the attendees to see who is still participating. Furthermore, at any time during the call, a participant may request a poll of the attendees.

MEETING PURPOSE

Mr. Colaco indicated that the purpose of this meeting is to allow the industry an opportunity to review and approve the revised petition that will be filed with the Wisconsin Public Service Commission for the relief of the 920 NPA. Mr. Colaco explained that this petition results from a relief meeting held in September 29, 1999 during which time the industry reached consensus to recommend an all services overlay as its choice for relief of the 920 NPA. Mr. Colaco stated that the industry also agreed that NANPA would withhold filing the relief petition with the Commission until either the available supply of NXX codes fell below 180, or if the NPA is projected to exhaust within twenty-four months, whichever occurred first. The 2002 Number Resource Utilization Forecast (NRUF) revised October 25, 2002 projects the 920 NPA to exhaust

during the 1Q2005. Currently there are 161 NXX codes available for assignment in the NPA.

Since the number of available NXX codes in the 920 NPA has dropped below the industry-established threshold, and it is projected to exhaust within twenty-four months, NANPA has prepared an updated relief filing that will be filed with the Commission. Due to the extraordinary length of time that has passed since the 920 NPA relief meeting was held, NANPA convened this industry conference call to review and approve the updated petition.

Furthermore, Mr. Colaco informed the participants that, in accordance with industry guidelines, changes to any previous consensus agreements related to the recommended relief of the 920 NPA will not be discussed during this meeting.

DISCUSSION OF WHEN TO FILE THE PETITION

Several industry members expressed concern that it may be premature to file this petition in view of the decreased code demand over the past 12 months and the fact that Thousands Block Number Pooling is scheduled to begin on April 4, 2003. After some discussion as to the restrictions the industry had per the INC guidelines on whether they could extend the date of when to file and possibly reset the trigger to file, it was decided the industry had this flexibility.

Therefore, a proposal was made, and consensus reached that the industry would not file the petition at this time, but rather wait until the impacts of pooling were more apparent and after the 2003 NRUF forecast was published. Consensus was reached that NANPA would conduct a follow-up review conference call within thirty days of the issuance of the 2003 NRUF forecast.

REVIEW OF THE REVISED PETITION FOR RELIEF OF THE 920 NPA

Mr. Colaco led a review of the petition. As a result, several minor text changes were made to the petition. Mr. Colaco stated the petition would be held in abeyance until such time the industry wishes to file it with the Wisconsin PSC (See attached).

CONFERENCE CALL TO APPROVE THE MINUTES

Consensus was reached that the draft minutes resulting from this meeting will be distributed to the industry by February 20, 2003 via NANPA's DDS system. Agreement was also reached that NANPA would convene a conference call to review and approve these minutes and the revised petition as follows:

Date: Wednesday, March 5, 2003

Time: 2:00 PM Eastern (1:00 PM Central, 11:00 AM Pacific)

Dial-in number: 847-619-6648

Pass code: 8832962#

**920 NPA – WISCONSIN
RELIEF PETITION REVIEW AND APPROVAL
FEBRUARY 6, 2003
VIA CONFERENCE CALL**

PARTICIPANTS

NAME	COMPANY
Anne Henderson	AT&T
Virgil Bjorge	Century Tel
Lori Deal	Interstate Telecom Consulting
Frank Colaco	NANPA NPA Relief Planning
Jim Deak	NANPA NPA Relief Planning
Joe Cocke	NANPA NPA Relief Planning
Tim Booth	NeuStar – Pooling Implementation
Ryan Block	SBC
Cassie Yang	SBC
Natalie McNamer	T-Mobile
Darlynn Hawkins	T-Mobile
Pat Maroney	Sprint PCS
Lori Lukins	TDS Telecom
Ken Madrzak	Verizon
Michiel Meulenberg	Verizon
Anthony van Lierop	Verizon
Joanne Edelman	Verizon Wireless
Murugan Kollengode	WI Public Service Commission
Chela O’Conner	WI Public Service Commission
Debra Gooden	WorldCom

PSC REF#:77592

Public Service Commission of Wisconsin
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EXHIBIT D

July 25, 2003

To: 920 NPA (Wisconsin) Code Holders and Other Industry Members

Re: Final Meeting Minutes and Revised Draft 920 NPA Relief Filing

Attached are the final minutes resulting from the industry meeting held June 26, 2003 to review the status of the 920 NPA. Additionally, attached is a revised version of the draft petition for relief of the 920 NPA that reflects a minor text revision as described in the attached meeting minutes.

If you have any questions please contact me at (805) 520-1945, or via email at joe.cocke@neustar.biz.

Regards,

Joseph R. Cocke
Senior NPA Relief Planner
NANPA

Enclosures

**920 NPA – WISCONSIN
RELIEF PLANNING FOLLOW-UP
FINAL MEETING MINUTES
VIA CONFERENCE CALL
JUNE 26, 2003**

WELCOME, INTRODUCTIONS & OBJECTIVE OF MEETING

Frank Colaco, Senior NPA Relief Planner – NANPA, opened the meeting with introductions and the objective of the meeting. A list of attendees can be found in Attachment #1.

REVIEW CONSENSUS PROCESS, MEETING MINUTES AND STATEMENTS FOR THE RECORD

Mr. Colaco stated that the ATIS (Alliance for Telecommunications Solutions) approved industry consensus process would be followed. He read the consensus process and explained the method by which consensus is determined. In addition, Mr. Colaco stated that the minutes would be comprised of consensus items. Nonconsensus items would be included in the minutes if the sponsoring party provided a written Statement for the Record. Such statements may be conveyed at any point during the meeting.

Additionally, Mr. Colaco explained that the following guidelines would apply in determining consensus during a conference call meeting: NANPA will proceed with the conference call based on those who announced themselves at the start of the call. It is at that time that it will be determined whether enough companies and industry segments are on the call to warrant continuing. During the course of the meeting some participants may, for any reason, choose to drop off the call without announcing their departure. Regardless, this will not influence the meeting proceeding according to the agenda. Silence on the part of the participants will be considered agreement with a proposal, based on those on the call at the time consensus is called. It will not be necessary to determine who is still on the call, when each consensus question is called. If it appears that consensus will be difficult to achieve on a given issue, or if an issue becomes controversial, NANPA may opt to poll the attendees to see who is still participating. Furthermore, at any time during the call, a participant may request a poll of the attendees.

PURPOSE OF THE CALL

Mr. Colaco recapped the 920 NPA relief meeting that was held September 29, 1999. During that meeting the industry participants reached consensus to recommend an all services distributed overlay as the preferred method for relief of the 920 NPA. Additionally, consensus was reached at that meeting to postpone filing a relief petition with the Wisconsin Public Service Commission ("Commission") until one of the following two triggers was reached; either the supply of available NXX codes in the 920 NPA was reduced to 180 codes, or the 920 NPA was within 24-months to exhaust, whichever occurred first.

In January 2003 both triggers were reached, and NANPA convened an industry meeting on February 6, 2003 to discuss filing the relief petition. At that meeting the Industry reached consensus to again postpone filing the 920 NPA relief petition with the Commission. Furthermore, it was agreed that NANPA would reconvene the Industry approximately 30-days after the publication of the June 2003 NRUF to evaluate the status of the 920 NPA numbering resources and determine if the petition should be filed with the Commission. The 2003 NRUF was published June 2, 2003, and projects the exhaust for the 920 NPA to occur during the 2Q2006. The previous 2002 NRUF exhaust projection for the 920 NPA was 1Q2005.

CO CODE ADMINISTRATION STATUS OF THE 920 NPA

Mr. Colaco reviewed the twelve-month code assignment history for the 920 NPA (see below). Mr. Colaco also reported that there are currently 146 NXX codes available for assignment, 626 assigned NXX codes and 28 unavailable NXX codes. In response to a question, it was noted that 1 previously assigned NXX code has been returned to NANPA, year-to-date.

	2002							2003					TOTAL
	JUN	JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	
Wireline	1	2	15	1	1	0	0	0	3	1	0	0	24
Wireless	1	0	2	1	1	1	0	2	10	0	0	0	18
Total	2	2	17	2	2	1	0	2	13	1	0	0	42

POOLING ADMINISTRATION STATUS OF THE 920 NPA

Mr. Timothy Booth, NeuStar Pooling Implementation, reported that number pooling in the 920 NPA started on April 4, 2003. The Pool Administrator has assigned 6 blocks to service providers in the 920 NPA since pooling began, and there are currently 1117 blocks available for assignment. The pooling assessment for the 920 NPA does not project the need for any whole NXX codes for pooling through the next 12 months.

FILING RELIEF PETITION WITH THE WISCONSIN PSC

Discussion ensued regarding the need to file the pending relief petition with the Wisconsin PSC for the 920 NPA. In response to an inquiry to change the order of preference of relief options, NANPA reminded the industry members that relief planning consensus items couldn't be reopened for industry revisions per the INC guidelines. However, once the relief petition is filed service providers can file their positions on their own behalf with the PSC. After considering the current status of the 920 NPA, a proposal was made, and consensus reached to again delay filing the 920 NPA relief petition with the Commission. Additionally, consensus was reached that NANPA would convene the industry approximately 30-days after the publication of the June 2004 NRUF to review the status of the 920 NPA numbering resources and determine if the relief petition needs to be filed with the Commission. If at that time it is determined the petition should be filed, the draft petition will be reviewed and updated by the Industry for filing by NANPA with the Wisconsin PSC. It was further agreed if in the meantime the supply of NXX codes in the 920 NPA falls to 118 codes or less prior to the release of the 2004 NRUF, NANPA would convene an industry meeting sooner to review the status of the NPA and consider filing the petition for relief.

DISCUSSION OF DISCREPANCY IN DRAFT RELIEF PETITION

An industry member brought to the attention of the meeting participants a discrepancy appearing on Page 3 of the draft petition referring to relief Alternative # 2 as having a split in a "southwestern to northeastern" direction, while on Page 6 of the same document the split is described as separating the 920 NPA into an "eastern and western" half. For consistency, the participants agreed to revise the description of split Alternative #2, appearing on Page 6 to reflect that the split line separates the 920 NPA into a "northeastern and southwestern" half. Mr. Colaco indicated that NANPA would have their legal counsel revise the wording in the draft petition. The revised version of the draft petition reflecting this change is attached to these minutes.

REVIEW OF DRAFT MEETING MINUTES

Consensus was reached that the draft minutes resulting from this meeting will be distributed to the Industry via NANPA's DDS system by July 10, 2003. Additionally, it was agreed that in lieu of conference call to review these minutes, industry members would have until July 24, 2003 to contact Mr. Colaco with any corrections, after which time the record will become final.

ATTACHMENT 1

**920 NPA – WISCONSIN
RELIEF PLANNING FOLLOW-UP MEETING
JUNE 26, 2003
VIA CONFERENCE CALL**

ATTENDEES

NAME	COMPANY
Stephen Jorganson	AT&T Wireline
Ann Meldahl	Century Tel
Joe Cocke	NANPA NPA Relief Planning
Frank Colaco	NANPA NPA Relief Planning
Jim Deak	NANPA NPA Relief Planning
Tim Booth	NeuStar Pooling Implementation
Kevin Gatchel	NeuStar Pooling Administration
Andrea Velilla	NeuStar Pooling Administration
Cassie Yang	SBC
Sandi Matson	TDS Metrocom
Gloria Trummer	TDS Telecom
Phil Smedema	Lakefield Telephone
Phil Nass	Lakefield Telephone
Ron Cannon	Verizon
Paul Verhoeven	Verizon
Linda Jedlowski	Verizon Wireless
Nick Lester	Wisconsin. State Telephone Association

**Before the
PUBLIC SERVICE COMMISSION OF WISCONSIN
Madison, Wisconsin 53707-7854**

NANPA, on behalf of the)	
Wisconsin Telecommunications Industry,)	
Petition for Approval of NPA Relief Plan)	Docket No. _____
for the 920 NPA)	

**PETITION OF THE NORTH AMERICAN NUMBERING
PLAN ADMINISTRATOR ON BEHALF OF THE
WISCONSIN TELECOMMUNICATIONS INDUSTRY**

NeuStar, Inc., the North American Numbering Plan Administrator (“NANPA”), in its role as the neutral third party NPA Relief Planner for Wisconsin under the North American Numbering Plan and on behalf of the Wisconsin telecommunications Industry (“Industry”),¹ petitions the Public Service Commission of Wisconsin (“Commission”)² to approve the Industry’s consensus decision to recommend to the Commission an all-services distributed overlay as its first choice for relief for the 920 numbering plan area (“NPA”).³ Additionally, the Industry reached consensus to recommend a southwest to northeast geographic split approximately through the midsection of the 920 NPA as its second choice for relief.⁴ The

¹ The Industry is composed of current and prospective telecommunications carriers operating in, or considering operations within, the 920 area code of Wisconsin.

² The Federal Communications Commission (“FCC”) delegated authority to review and approve NPA relief plans to the states. *See* 47 C.F.R. § 52.19.

³ As the neutral third party administrator, NANPA has no independent view regarding the relief option selected by the Industry.

⁴ In order to plan for the introduction of new area codes, NANPA and the Industry utilize the NPA Code Relief Planning & Notification Guidelines (INC 97-0404-016, Nov. 13, 2000) (“NPA Relief Planning Guidelines”). The NPA Relief Planning Guidelines assist NANPA, the Industry and Regulatory Authorities within a particular geographic NPA in the planning and execution of relief efforts. The NPA Relief Planning Guidelines can be accessed on the ATIS web site located at <http://www.atis.org/atis/clc/inc/incdocs.htm>.

Industry submits its recommendations to the Commission based upon NANPA's projections that absent NPA relief, the supply of central office codes (often referred to as "CO" or "NXX" codes) for the 920 NPA will exhaust during the first quarter of 2005 and the number of CO codes remaining available for assignment is less than 180, a trigger for filing a relief petition with the Commission as predetermined by the Industry. In support of this petition and on behalf of the Industry, NANPA submits the following: [ADD UPDATED HISTORICAL INFORMATION HERE WHEN THIS PETITION IS FILED (3/5/03)]

I. BACKGROUND

In 1999, NeuStar released a Central Office Code Utilization Survey ("COCUS") projection for CO code utilization indicating that the 920 NPA would exhaust during the first quarter of 2001. NANPA notified the Industry members and the Commission on August 18, 1999 that NPA relief planning needed to be addressed. The Industry met on September 29, 1999 in Green Bay, Wisconsin to discuss various relief alternatives.⁵ Pursuant to the NPA Relief Planning Guidelines, NANPA distributed an Initial Planning Document ("IPD") to the Industry prior to the relief planning meeting.⁶ The IPD contained descriptions, maps, general facts and assumptions, and the projected lives of one all-services distributed overlay relief alternative and three geographic split alternatives. No additional alternatives were proposed by Industry members prior to or at the meeting.

⁵ A copy of the minutes of the September 29, 1999 Industry relief meeting, including a list of attendees, is attached as Exhibit A.

⁶ A copy of the IPD is attached as Attachment 3 to Exhibit A.

More specifically, the Industry participants considered the following alternatives:

- Alternative #1 – All-Services Distributed Overlay: A new NPA code would be assigned to the same geographic area as the existing 920 NPA. Alternative #1 has a projected life of 5 years.⁷
- Alternative #2 – Geographic Split: The proposed split boundary line runs along rate center boundaries in a southwest to northeast direction and approximates the LATA boundaries between LATA 350 and LATA 356. The proposed boundary runs north of Kingston, Pickett, Chilton, and Tisch Mills rate centers, creating two new NPA areas. The northern area is referred to as “Area A” and the southern area is referred to as “Area B.” Area A has a projected NPA life of 3.6 years to exhaust and Area B has a projected NPA life of 7 years to exhaust.
- Alternative #3 – Geographic Split: The proposed split boundary line runs along rate center boundaries in a north to south direction approximately through the center of the 920 NPA. The proposed boundary runs east of Seymour, Neenah, Eden, and Campbellsport rate centers and creates two new NPA areas. The western area is referred to as “Area A” and the eastern area is referred to as “Area B.” Area A has a projected NPA life of 4 years to exhaust and Area B has a projected NPA life of 6.2 years to exhaust.
- Alternative #4 – The proposed split boundary line runs along rate center boundaries in a north to south direction but more to the east than Alternative #3. The proposed boundary runs west of Seymour, Stockbridge, Brandon, and Lomira rate centers and creates two new

⁷ The projected lives of the alternatives were calculated in accordance with trends in demand that existed and were reported at the time the IPD was created. As set forth below, drastic decreases in demand for numbering resources since September of 1999 have resulted in changes in the projected lives of the relief alternatives.

NPA areas. The western area is referred to as “Area A” and the eastern area is referred to as “Area B.” Area A has a projected NPA life of 5.5 years to exhaust and Area B has a projected NPA life of 4.6 years to exhaust.

At the September 29, 1999 meeting, the participants discussed the attributes of the relief alternatives and reached consensus to recommend to the Commission Alternative #1, the all-services distributed overlay plan, as their first choice for relief for the 920 NPA. The Industry set forth the following reasons for recommending the all-services overlay to the Commission:

- An all services distributed overlay can be implemented in a shorter interval than a geographic split;
- An overlay does not reduce the geographic size of the NPA;
- Subsequent relief likely will be another overlay;
- Overlays avoid the need for time consuming and politically complicated decision-making process to determine the location of the split boundary and which area will retain the existing NPA;
- No existing customer telephone numbers will be changed; and
- An overlay minimizes customers’ need to change stationery, business cards and advertising.

As their second choice, the Industry participants reached consensus to recommend Alternative #2, a geographic split, should the Commission reject an all-services distributed overlay relief plan. The Industry members reached consensus to eliminate from consideration the remaining alternatives, Alternatives #3 and #4, because the split boundaries for these alternatives did not follow LATA boundaries, thereby dividing local calling areas and making customer education more difficult. Industry members also noted that previously implemented geographic splits have not extended the life of affected NPAs for as long as originally projected.

After reaching consensus on the relief plans to recommend to the Commission, the Industry discussed the recent decline in demand for CO codes and certain proposed number conservation measures, such as an Industry investigation into protected (unassignable) CO codes, reclamation of unused CO codes from service providers, implementation of thousands block

number pooling and rate center consolidation that may extend the life of the 920 NPA beyond first quarter 2001. The Industry decided, therefore, to delay the filing of a petition setting forth the Industry's recommendation until the supply of available CO codes reached less than 180 CO codes or projected exhaust is less than 24 months away. Indeed, due to the decline in demand for CO codes and the expectation of number pooling, the projected life of the 920 NPA was extended by several years. In recent months, however, a renewed increase in demand for CO codes has resulted in NANPA issuing a revised projected exhaust date for the 920 NPA as first quarter 2005.⁸ This recent increase in demand also resulted in the number of CO codes available for assignment reaching a level below 180, thereby triggering the filing of the instant petition.

[ADD UPDATED INFORMATION HERE WHEN THIS PETITION IS FILED (3/5/03)]

The projected lives of the alternatives were calculated in accordance with trends in demand that existed and were reported at the time the IPD was created. Number conservation measures and economic conditions have resulted in decreased demand and, therefore, the projected lives of the four alternatives have changed substantially since the Industry reached consensus on an NPA relief alternative. Pursuant to Industry guidelines, neither NANPA nor the Industry can change an Industry consensus decision regarding NPA relief, but, for the use and convenience of the Commission, NANPA hereby provides the updated projected lives of the

⁸ On October 31, 2002, NeuStar released an update to its 2002 NRUF [Number Resource Utilization Forecast, formerly called COCUS] and NPA Exhaust Analysis, June 5, 2002 ("2002 NRUF Report"). The 2002 NPA Exhaust Analysis Changes as of October 31, 2002 and the 2002 NRUF Report can be accessed on the NANPA web site at <http://www.nanpa.com>.

relief alternatives based upon the most recent information available. Based upon the new data, the new projected exhaust dates for the five alternatives are as follows:

- Alternative 1: 16 years;
- Alternative 2: Area A 13 years, Area B 21 years;
- Alternative 3: Area A 13 years, Area B 20 years;
- Alternative 4: Area A 19 years, Area B 14 years;

NANPA provided these new dates to the Industry at a February 6, 2003 meeting during which the industry reviewed and approved the instant petition. Also during the February 6 meeting, the Industry reviewed the status of the 920 NPA and, based upon a decrease in demand for CO codes during the previous 12 months and the implementation of thousands block pooling scheduled for April 4, 2003, reached consensus to delay the filing of the petition with the Commission. According to the Industry's consensus decision, NANPA will reconvene a meeting of the Industry within 30 days after the release of the 2003 NRUF Report to provide the Industry with an opportunity to evaluate the timing for filing the petition.

II. DESCRIPTION OF THE RECOMMENDED RELIEF PLANS

Alternative #1, the all-services distributed overlay, would superimpose a new NPA over the same geographic area covered by the existing 920 NPA. All existing customers would retain the 920 area code and would not have to change their telephone numbers. Consistent with FCC regulations, the relief plan would require 10-digit dialing for all local calls within and between the 920 NPA and the new NPA.⁹ When the 920 NPA exhausts, all CO code assignments will be made from the new overlay area code. As set forth in the previous section, the projected life of Alternative #1 is now 16 years.

Alternative #2, a geographic split, would split the 920 NPA into two NPAs with the dividing boundary separating the 920 NPA into a northeastern and southwestern half. A

⁹ 47 C.F.R. §52.19(c)(3)(ii).

geographic split requires customers located within the area receiving the new area code to change their telephone numbers. All local calls within the home NPA will continue to be dialed using seven-digit. However, the Industry participants reached consensus to recommend that permissive ten-digit dialing be extended for up to two years following relief for wireless service providers. The projected lives of the two NPAs created by Alternative #2 are now 13 and 21 years. The Industry decided not to develop a relief implementation plan until the Commission issues an order for relief.

III. CONCLUSION

The Industry has determined the need to initiate relief efforts for the 920 NPA in Wisconsin to prevent the exhaust of numbering resources. The Industry respectfully requests that the Commission issue an order approving either the Industry's first choice for relief for the 920 NPA, an all-services distributed overlay or the Industry's second choice, a two-way geographic split.

Respectfully submitted,

Kimberly Wheeler Miller

NeuStar, Inc.
North American Numbering Plan Administrator
1120 Vermont Avenue, N.W., Suite 400
Washington, D.C. 20005
(202) 533-2912

Frank Colaco
Sr. NPA Relief Planner – Central Region
NeuStar, Inc.
North American Numbering Plan Administrator
46000 Center Oak Plaza
Sterling, VA 20166
(973) 740-9100
[DATE]

PSC REF#:77593

Public Service Commission of Wisconsin
RECEIVED: 06/19/07, 3:22:15 PM

EXHIBIT E

June 18, 2004

To: All 920 NPA Code Holders and Other Industry Members (Wisconsin)

Re: Final Minutes to Industry Conference Call to Address Pending Filing of the Petition for Approval of the 920 NPA Relief Plan

Attached are the final minutes to the May 26, 2004, industry conference call to address filing of the pending relief petition for the 920 NPA. The industry reached consensus to delay filing the relief petition with the Wisconsin Public Service Commission (PSC) until after further review of the next forecasted exhaust.

The industry agreed to meet approximately 30 days after the release of the next 2004 NRUF in October to review the status of the NPA and consider filing the petition for relief.

If you have any questions, please give me a call at (805) 520-1945.

Regards,

Joseph R. Cocke
Sr. NPA Relief Planner
NANPA

C: Gary Evenson – WI PSC Staff

Attachments

**920 NPA – WISCONSIN
RELIEF PLANNING FOLLOW-UP
FINAL MEETING MINUTES
VIA CONFERENCE CALL
May 26, 2004**

WELCOME, INTRODUCTIONS & OBJECTIVE OF MEETING

Joe Cocke, Senior NPA Relief Planner – NANPA, opened the meeting with introductions and the objective of the meeting. A list of attendees can be found in Attachment #1. Joe mentioned this is our quality survey month and immediately following the conference call the attendees would receive an electronic survey regarding NANPA's performance.

REVIEW CONSENSUS PROCESS, MEETING MINUTES AND STATEMENTS FOR THE RECORD

Mr. Cocke stated that the ATIS (Alliance for Telecommunications Solutions) approved industry consensus process would be followed. He reviewed the consensus process and explained the method by which consensus is determined. In addition, Mr. Cocke stated that the minutes would be comprised of consensus items. Nonconsensus items would be included in the minutes if the sponsoring party provided a written Statement for the Record. Such statements may be conveyed at any point during the meeting. Additionally, Mr. Cocke explained that the following guidelines would apply in determining consensus during a conference call meeting: NANPA will proceed with the conference call based on those who announced themselves at the start of the call. It is at that time that it will be determined whether enough companies and industry segments are on the call to warrant continuing. During the course of the meeting some participants may, for any reason, choose to drop off the call without announcing their departure. Regardless, this will not influence the meeting proceeding according to the agenda. Silence on the part of the participants will be considered agreement with a proposal, based on those on the call at the time consensus is called. It will not be necessary to determine who is still on the call, when each consensus question is called. If it appears that consensus will be difficult to achieve on a given issue, or if an issue becomes controversial, NANPA may opt to poll the attendees to see who is still participating. Furthermore, at any time during the call, a participant may request a poll of the attendees.

PURPOSE OF THE CALL

Mr. Cocke recapped the 920 NPA relief meeting that was held September 29, 1999. During that meeting the industry participants reached consensus to recommend an all services distributed overlay as the preferred method for relief of the 920 NPA. Additionally, consensus was reached at that meeting to postpone filing a relief petition with the Wisconsin Public Service Commission ("Commission") until one of the following two triggers was reached; either the supply of available NXX codes in the 920 NPA was reduced to 180 codes, or the 920 NPA was within 24-months to exhaust, whichever occurred first. In January 2003 both triggers were reached, and NANPA convened an industry meeting on February 6, 2003 to discuss filing the relief petition. At that meeting the Industry reached consensus to again postpone filing the 920 NPA relief petition with the Commission. Furthermore, it was agreed that NANPA would reconvene the Industry approximately 30-days after the publication of the June 2003 NRUF to evaluate the status of the 920 NPA numbering resources and determine if the petition should be filed with the Commission. The 2003 NRUF was published June 2, 2003, and projected the exhaust for the 920 NPA to occur during the 2Q2006. The industry met last June and decided to wait until the 2004

NRUF results to review the status and determine the next steps. Now the most recent 2004 NRUF forecast reflects the 920 NPA will exhaust in 1Q2007. (Within 32 months)

CO CODE ADMINISTRATION STATUS OF THE 920 NPA

Mr. Cocke reviewed the 2003 and 2004 YTD code assignment history for the 920 NPA (see below). He also reported that as of April 30, 2004 there were 130 NXX codes available for assignment, 642 assigned NXX codes and 28 unavailable NXX codes.

2003 History: 28 assignments and 3 returns

2004 History: 6 assignments and 1 code returned in April

Jan	Feb	Mar	Apr	May	Total
1	0	2	3	0*	6

*As of May 24, 2004 there were no assignments in May.

POOLING ADMINISTRATION STATUS OF THE 920 NPA

Mr. Timothy Booth, NeuStar Pooling Implementation, reported that number pooling in the 920 NPA started on April 4, 2003. The Pool Administrator has assigned 40 blocks to service providers in the 920 NPA since pooling began, and there are currently 1170 blocks available for assignment. He also mentioned there are of the total 126 rate centers: 11 rate centers are mandatory pooling (5 with one service provider), 72 optional pooling and 43 rate centers that are excluded from pooling. Andrea Velilla, NeuStar Pooling Administration, stated the pooling assessment for the 920 NPA projects 46 blocks are required with no requirement for any whole NXX codes through the next 12 months.

FILING RELIEF PETITION WITH THE WISCONSIN PSC

Discussion ensued regarding the need to file the pending relief petition with the Wisconsin PSC for the 920 NPA. After considering the current status of the 920 NPA, a proposal was made, and consensus reached to again delay filing the 920 NPA relief petition with the Commission. Additionally, consensus was reached that NANPA would convene the industry within one month after the publication of the October 2004 NRUF to review the status of the 920 NPA numbering resources and determine if the relief petition needs to be filed with the Commission. If at that time it is determined the petition should be filed, the draft petition will be reviewed and updated by the Industry for filing by NANPA with the Wisconsin PSC.

REVIEW OF DRAFT MEETING MINUTES

Consensus was reached that the draft minutes resulting from this meeting will be distributed to the Industry via NANPA's NAS-NNS system by June 9, 2004. Additionally, it was agreed that in lieu of conference call to review these minutes, industry members would have until June 16, 2003 to contact Joe at (805) 520-1945 or via email at joe.cocke@neustar.biz with any corrections, after which time the minutes will become final.

Adjourn

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**920 NPA – WISCONSIN
ADDRESS FILING MEETING
VIA CONFERENCE CALL
MAY 26, 2004
PARTICIPANTS**

NAME	COMPANY
Joe Cocke	NANPA NPA Relief Planning
Wayne Milby	NANPA NPA Relief Planning
Andrea Velilla	NeuStar Pooling Administration
Tim Booth	NeuStar Pooling Implementation
Craig Winters	Nextel
Renate Howell	SBC
Michael Klasen	SBC
Pat Maroney	Sprint PCS
Sandy Matson	TDS Metrocom
Natalie McNamer	T-mobile
Beverly Hamilton	Verizon
Paul Verhoeven	Verizon
Jena Downs	Verizon
Anthony van Lierop	Verizon
Joanne Edelman	Verizon Wireless
Dana Smith	Verizon Wireless

PSC REF#:77594

Public Service Commission of Wisconsin
RECEIVED: 06/19/07, 3:22:15 PM

EXHIBIT F

December 7, 2004

To: All 920 NPA Code Holders and Other Industry Members (Wisconsin)

Re: Final Minutes to Industry Conference Call to Address Pending Filing of the Petition for Approval of the 920 NPA Relief Plan

Attached are the final minutes to the November 17, 2004, industry conference call to address filing of the pending relief petition for the 920 NPA. The industry reached consensus to delay filing the relief petition with the Wisconsin Public Service Commission (PSC) until after further review of the October 2005 forecasted exhaust.

The industry agreed to meet approximately 30 days after the release of the 2005 NRUF in October to review the status of the NPA and consider filing the petition for relief.

If you have any questions, please give me a call at (805) 520-1945.

Regards,

Joseph R. Cocke
Sr. NPA Relief Planner
NANPA

C: Gary Evenson – WI PSC Staff

Attachments

**920 NPA – WISCONSIN
RELIEF PLANNING FOLLOW-UP
FINAL MEETING MINUTES
VIA CONFERENCE CALL
November 17, 2004**

WELCOME, INTRODUCTIONS & OBJECTIVE OF MEETING

Joe Cocke, Senior NPA Relief Planner – NANPA, opened the meeting with introductions and the objective of the meeting. A list of attendees can be found in Attachment #1. Joe mentioned this is our quality survey month and immediately following the conference call the attendees would receive an electronic survey regarding NANPA's performance.

REVIEW CONSENSUS PROCESS, MEETING MINUTES AND STATEMENTS FOR THE RECORD

Mr. Cocke stated that the ATIS (Alliance for Telecommunications Solutions) approved industry consensus process would be followed. He reviewed the consensus process and explained the method by which consensus is determined. In addition, Mr. Cocke stated that the minutes would be comprised of consensus items. Nonconsensus items would be included in the minutes if the sponsoring party provided a written Statement for the Record. Such statements may be conveyed at any point during the meeting. Additionally, Mr. Cocke explained that the following guidelines would apply in determining consensus during a conference call meeting: NANPA will proceed with the conference call based on those who announced themselves at the start of the call. It is at that time that it will be determined whether enough companies and industry segments are on the call to warrant continuing. During the course of the meeting some participants may, for any reason, choose to drop off the call without announcing their departure. Regardless, this will not influence the meeting proceeding according to the agenda. Silence on the part of the participants will be considered agreement with a proposal, based on those on the call at the time consensus is called. It will not be necessary to determine who is still on the call, when each consensus question is called. If it appears that consensus will be difficult to achieve on a given issue, or if an issue becomes controversial, NANPA may opt to poll the attendees to see who is still participating. Furthermore, at any time during the call, a participant may request a poll of the attendees.

PURPOSE OF THE CALL

Mr. Cocke recapped the last review meeting for the 920 NPA relief was held May 26, 2004. During that meeting the industry participants reached consensus to postpone filing a relief petition with the Wisconsin Public Service Commission ("Commission") until review of the next NRUF forecast in October 2004. In anticipation of the publication, approximately 30-days afterward, NANPA scheduled this meeting. This meeting is to evaluate the status of the 920 NPA numbering resources and determine if the petition should be filed with the Commission. The preliminary view of the October 2004 NRUF forecast reflects the 920 NPA exhaust will be extended from 1Q2007 to 4Q2008 due to reduced demand.

CO CODE ADMINISTRATION STATUS OF THE 920 NPA

Mr. Cocke reviewed the 2003 and 2004 YTD code assignment history for the 920 NPA (see attachment 2). He also reported that as of October 31, 2004 there were 127 NXX codes available for assignment, 645 assigned NXX codes and 28 unavailable NXX codes.

2003 History: 28 assignments and 3 returns

2004 History: 12 assignments and 2 codes returned YTD:

Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Total
1	0	2	3	0*	2	2	1	0	0	1*	12

*As of Nov 16, 2004 there was one assignment in Nov.

POOLING ADMINISTRATION STATUS OF THE 920 NPA

Mr. Timothy Booth, NeuStar Pooling Implementation, reported that number pooling in the 920 NPA started on April 4, 2003. The Pooling Administrator has assigned 68 blocks to service providers in the 920 NPA in the last 12 months, and there are currently 1146 blocks available for assignment. He also mentioned there are of the total 126 rate centers: 11 rate centers are mandatory pooling (3 with one service provider), 72 optional pooling and 43 rate centers that are excluded from pooling. (See Attachment 3)

An industry member inquired if any of the codes assigned since our last meeting in May were for the Pooling Administration (*This answer was not available during the meeting but was provided after the meeting adjourned*) The Pooling Administration response is no codes were opened for the PA since May in the WI 920 NPA.

FILING RELIEF PETITION WITH THE WISCONSIN PSC

Discussion ensued regarding the need to file the pending relief petition with the Wisconsin PSC for the 920 NPA. After considering the current status of the 920 NPA, a proposal was made, and consensus reached to again delay filing the 920 NPA relief petition with the Commission. Additionally, consensus was reached that NANPA would convene the industry within one month after the publication of the October 2005 NRUF to review the status of the 920 NPA numbering resources and determine if the relief petition needs to be filed with the Commission. If at that time it is determined the petition should be filed, the draft petition will be reviewed and updated by the Industry for filing by NANPA with the Wisconsin PSC. It was further agreed that if a significant number of NXX codes have been assigned prior to the release of the October 2005 NRUF resulting in a revision to the projected exhaust of the 920 NPA, NANPA would convene an industry meeting.

REVIEW OF DRAFT MEETING MINUTES

Consensus was reached that the draft minutes resulting from this meeting will be distributed to the Industry via NANPA's NAS-NNS system on or before November 24, 2004. Additionally, it was agreed that in lieu of conference call to review these minutes, industry members would have until December 2, 2004 to contact Joe at (805) 520-1945 or via email at joe.cocke@neustar.biz with any corrections, after which time the minutes will become final.

Adjourn

###

**920 NPA – WISCONSIN
ADDRESS FILING MEETING
VIA CONFERENCE CALL
November 17, 2004
PARTICIPANTS**

NAME	COMPANY
Marcy Baxter	AT&T Local
Ann Meldahl	Century Tel
Ron Kakiki	Cingular
Joe Cocke	NANPA NPA Relief Planning
Wayne Milby	NANPA NPA Relief Planning
Tim Booth	NeuStar Pooling Implementation
Craig Winters	Nextel
Jeff Kola	Northern Telephone & Data
Renate Howell	SBC
Craig Mindell	SBC
Pat Maroney	Sprint PCS
Bob Klabunde	State Long Distant Telco
Paul Verhoeven	Verizon
Jena Downs	Verizon
Catherine Palcic	Verizon
Dana Smith	Verizon Wireless

Wisconsin
NPA 920NXX Summary
Data as of October 28, 2004

Attachment 2

<u>NPA</u>	<u>920</u>					
Assigned NXXs	645					
Protected NXXs	0					
Reserved NXXs	0					
Unavailable NXXs	28	See Note				
Available NXXs	127					
Total	800					
<u>Codes Assigned NPA 920</u>	<u>01/2003</u>	<u>02/2003</u>	<u>03/2003</u>	<u>04/2003</u>	<u>05/2003</u>	<u>06/2003</u>
	2	13	1			1
	<u>07/2003</u>	<u>08/2003</u>	<u>09/2003</u>	<u>10/2003</u>	<u>11/2003</u>	<u>12/2003</u>
	2	6	2			1
	<u>01/2004</u>	<u>02/2004</u>	<u>03/2004</u>	<u>04/2004</u>	<u>05/2004</u>	<u>06/2004</u>
	1		2	3		2
	<u>07/2004</u>	<u>08/2004</u>	<u>09/2004</u>	<u>10/2004</u>		
	2	1				
Note: Unavailable indicates codes that are unavailable for assignment. These codes include, but are not limited to, test and special use codes (e.g., 958,959, 555, time), N11 and other unique codes (e.g., 976, 950), codes set aside for pooling, and codes with special dialing arrangements (e.g., 7-digit dialing across NPA boundary).						

NANPA MEETINGS: POOLING STATISTICS	
<i>Provided By: Cecilia Louie</i>	
ST/NPA	WI 920
MEETING DATE	
MEETING SUBJECT	
<i>Relief Planning</i>	X
<i>Jeopardy</i>	
<i>UA NXXs</i>	
<i>Other</i>	
POOL START DATE (PSD)	4/4/2003
RATE CENTERS	
<i># Total</i>	126
<i># Mandatory</i>	8
<i># Mandatory-Single Service Provider (M*)</i>	3
<i># Optional</i>	72
<i># Excluded</i>	43
# BLOCKS ASSIGNED for past 12 months up to 10/22/04	68
# BLOCKS AVAILABLE	1146
As of preparation date for current meeting: 10/22/04	

PSC REF#:77595

Public Service Commission of Wisconsin
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EXHIBIT G

December 13, 2005

To: All 920 NPA Code Holders and Other Industry Members (Wisconsin)

Re: Final Minutes to Industry Conference Call to Address Pending Filing of the Petition
for Approval of the 920 NPA Relief Plan

Attached are the final minutes to the November 22, 2005, industry conference call to address filing of the pending relief petition for the 920 NPA. The industry reached consensus to delay filing the relief petition with the Wisconsin Public Service Commission (PSC) until after further review of the April 2006 forecasted exhaust.

If you have any questions, please give me a call at (805) 520-1945.

Regards,

Joseph R. Cocke
Sr. NPA Relief Planner
NANPA

C: Gary Evenson – WI PSC Staff

Attachments

**920 NPA – WISCONSIN
RELIEF PLANNING FOLLOW-UP
FINAL MEETING MINUTES
VIA CONFERENCE CALL
November 22, 2005**

WELCOME, INTRODUCTIONS & OBJECTIVE OF MEETING

Joe Cocke, Senior NPA Relief Planner – NANPA, opened the meeting with introductions and the objective of the meeting. A list of attendees can be found in Attachment #1. Joe mentioned this is our quality survey month and immediately following the conference call the attendees would receive an electronic survey regarding NANPA's performance.

REVIEW CONSENSUS PROCESS, MEETING MINUTES AND STATEMENTS FOR THE RECORD

Mr. Cocke stated that the ATIS (Alliance for Telecommunications Solutions) approved industry consensus process would be followed. He reviewed the consensus process and explained how consensus is determined. Mr. Cocke explained that silence on the part of the participants will be considered agreement with a proposal, based on those on the call at the time consensus is called. In addition, Mr. Cocke stated that the minutes would be comprised of consensus items, and that issues not captured by consensus could be expressed in the form of a Statement for the Record, which could be conveyed at any point during the meeting.

PURPOSE OF THE CALL

Mr. Cocke recapped the last review meeting for the 920 NPA relief was held November 17, 2004. During that meeting the industry participants reached consensus to postpone filing a relief petition with the Wisconsin Public Service Commission ("Commission") until review of the next NRUF forecast in October 2005, and NANPA would convene a meeting within thirty days of the publication. This meeting is to evaluate the status of the 920 NPA numbering resources and determine if the petition should be filed with the Commission. The October 2005 NRUF forecast reflects the 920 NPA exhaust has been extended from 2Q2008 to 4Q2008.

CO CODE ADMINISTRATION STATUS OF THE 920 NPA

Mr. Cocke reviewed the 2003-2004 and 2005 YTD code assignment history for the 920 NPA (see below). He also reported that as of November 21, 2005 there were 124 NXX codes available for assignment, 651 assigned NXX codes and 25 unavailable NXX codes. He also noted the NPA is not in jeopardy or rationing.

2003 History: 28 assignments and 3 returns

2004 History: 12 assignments and 2 codes returned

2005 History: 14 assignments and 5 codes returned: YTD

Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
1	2	1	0	1	0	2	0	2	4	1*		14

1 assignment in November as of 11/21/05

POOLING ADMINISTRATION STATUS OF THE 920 NPA

Mr. Timothy Booth, NeuStar Pooling Implementation, reported that number pooling in the 920 NPA started on April 4, 2003. The Pooling Administrator has assigned 223 blocks to service providers in the 920 NPA since pooling began, and there are currently 1239 blocks available for

assignment. He also mentioned there are of the total 126 rate centers: 11 rate centers are mandatory pooling, 72 optional pooling and 43 rate centers that are excluded from pooling. The pooling administration has a demand of zero codes forecasted for the next six months. Of the codes assigned in the past year, 4 were for pool replenishment and 6 were for LRNs.

FILING RELIEF PETITION WITH THE WISCONSIN PSC

Discussion ensued regarding the need to file the pending relief petition with the Wisconsin PSC for the 920 NPA. After considering the current status of the 920 NPA, a proposal was made, and consensus reached to again delay filing the 920 NPA relief petition with the Commission. Additionally, consensus was reached that NANPA would convene the industry within one month after the publication of the April 2006 NRUF to review the status of the 920 NPA numbering resources and determine if the relief petition needs to be filed with the Commission. If at that time it is determined the petition should be filed, the draft petition will be reviewed and updated by the Industry for filing by NANPA with the Wisconsin PSC.

It was noted by an industry member that at the original planning meeting the industry agreed to an extended permissive dialing period for wireless codes, however this was before LNP and pooling were introduced. With LNP and pooling an extended permissive dialing period would apply to wireline as well as wireless customers instead of only wireless as was originally intended. This issue needs to be addressed by the industry when it is decided to file the petition. *It should be noted that since this was a consensus item NANPA would need letters from two separate service providers to reopen this issue.*

REVIEW OF DRAFT MEETING MINUTES

Consensus was reached that the draft minutes resulting from this meeting will be distributed to the Industry via NANPA's NAS-NNS system on or before December 6, 2005. Additionally, it was agreed that in lieu of conference call to review these minutes, industry members would have until December 12, 2005 to contact Joe at (805) 520-1945 or via email at joe.cocke@neustar.biz with any corrections, after which time the minutes will become final.

Adjourn

###

**920 NPA – WISCONSIN
ADDRESS FILING MEETING
VIA CONFERENCE CALL
November 22, 2005
PARTICIPANTS**

NAME	COMPANY
Brenda Summerlin	Alltel
Marcy Baxter	AT&T Local
Bryan Kowalczyk	Charter Communications
Julie Neumann	Cingular
Joe Cocke	NANPA NPA Relief Planning
Wayne Milby	NANPA NPA Relief Planning
Genevieve Paulino	Pooling Administration
Tim Booth	NeuStar Pooling Implementation
Pat Maroney	Sprint PCS
Natalie McNamer	T-mobile
Aubrey Anderson	Verizon
Dana Smith	Verizon Wireless

PSC REF#:77596

Public Service Commission of Wisconsin
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EXHIBIT H

June 9, 2006

To: All 920 NPA Code Holders and Other Industry Members (Wisconsin)

Re: Final Minutes to Industry Conference Call to Address Pending Filing of the Petition for Approval of the 920 NPA Relief Plan

Attached are the final minutes to the May 19, 2006, industry conference call to address filing of the pending relief petition for the 920 NPA. The industry reached consensus to delay filing the relief petition with the Wisconsin Public Service Commission (PSC) until after further review of the April 2007 forecasted exhaust.

The industry agreed to meet approximately 30 days after the publication of the April 2007 NRUF to review the status of the NPA and consider filing the petition for relief.

If you have any questions, please give me a call at (805) 520-1945.

Regards,

Joseph R. Cocke
Sr. NPA Relief Planner
NANPA

C: Gary Evenson – WI PSC Staff

Attachments

**920 NPA – WISCONSIN
RELIEF PLANNING FOLLOW-UP
FINAL MEETING MINUTES
VIA CONFERENCE CALL
May 19, 2006**

WELCOME, INTRODUCTIONS & OBJECTIVE OF MEETING

Joe Cocke, Senior NPA Relief Planner – NANPA, opened the meeting with introductions and the objective of the meeting. A list of attendees can be found in Attachment #1. Joe mentioned this is our quality survey month and immediately following the conference call the attendees would receive an electronic survey regarding NANPA's performance.

REVIEW CONSENSUS PROCESS, MEETING MINUTES AND STATEMENTS FOR THE RECORD

Mr. Cocke stated that the ATIS (Alliance for Telecommunications Industry Solutions) approved industry consensus process would be followed. He reviewed the consensus process and explained how consensus is determined. Mr. Cocke explained that silence on the part of the participants will be considered agreement with a proposal, based on those on the call at the time consensus is called. In addition, Mr. Cocke stated that the minutes would be comprised of consensus items, and that issues not captured by consensus could be expressed in the form of a Statement for the Record, which could be conveyed at any point during the meeting.

PURPOSE OF THE CALL

Mr. Cocke recapped the last review meeting for the 920 NPA relief was held November 22, 2005. During that meeting the industry participants reached consensus to postpone filing a relief petition with the Wisconsin Public Service Commission ("Commission") until review of the next NRUF forecast in April 2006, and NANPA would convene a meeting within thirty days of the publication. This meeting is to evaluate the status of the 920 NPA numbering resources and determine if the petition should be filed with the Commission. The April 2006 NRUF forecast published April 26, 2006, reflects the 920 NPA exhaust has been extended from 4Q2008 to 4Q2009. Additionally, NANPA has received four letters (one after the notice was issued) from industry members requesting the consensus item of "extended permissive dialing for wireless codes" be reopened, as well as address certain related verbiage in the approved draft petition.

CO CODE ADMINISTRATION STATUS OF THE 920 NPA

Mr. Cocke reviewed the 2005 and 2006 code assignment history for the 920 NPA (see below). He also reported that as of May 18, 2006 there were 118 NXX codes available for assignment, 661 assigned NXX codes and 21 unavailable NXX codes. Joe mentioned there were 4 UA codes recently released for assignment which changed the UA and available code amounts since the notice was issued. He also noted the NPA is not in jeopardy or rationing.

2005 History: 16 assignments and 5 codes returned

2006 History: 9 assignments and 1 code returned YTD

Jan	Feb	Mar	Apr	May	Total
2	4	3	0	0*	9

Assignments up through May 18, 2006

POOLING ADMINISTRATION STATUS OF THE 920 NPA

Mr. Timothy Booth, NeuStar Pooling Implementation, reported that number pooling in the 920 NPA started on April 4, 2003. The Pooling Administrator has assigned 248 blocks to service providers in the 920 NPA in the past year, and there are currently 1228 blocks available for assignment. He also mentioned there are of the total 126 rate centers: 11 rate centers are mandatory pooling, 73 optional pooling and 42 rate centers that are excluded from pooling. The pooling administration has a demand of eight codes forecasted for the next 12 months: 7 for pools and 1 for LRN. Of the 16 codes assigned in the past 12 months, 7 were for pool replenishment and 9 were for LRNs.

FILING RELIEF PETITION WITH THE WISCONSIN PSC

Discussion ensued regarding the need to file the pending relief petition with the Wisconsin PSC for the 920 NPA. After considering the current status of the 920 NPA, a proposal was made, and consensus reached to again delay filing the 920 NPA relief petition with the Commission. Additionally, consensus was reached that NANPA would convene the industry within one month after the publication of the April 2007 NRUF to review the status of the 920 NPA numbering resources and determine if the relief petition needs to be filed with the Commission. If at that time it is determined the petition should be filed, the revised draft petition will be reviewed and updated by the Industry for filing by NANPA with the Wisconsin PSC. It was further agreed that the industry would reconvene if the supply of available codes reaches 100 or less prior to the publication of the April 2007 NRUF.

CONSENSUS TO REOPEN A PRIOR CONSENSUS ITEM

Joe stated that NANPA had received four letters from service providers requesting the issue of requesting the WI PSC provide extended permissive dialing for wireless codes in the draft petition. Joe asked the question if anyone opposed reopening this consensus item. None opposed, therefore consensus was reached to reopen this item for discussion.

CONSENSUS TO CHANGE TEXT IN DRAFT PETITION ON EXTENDED PERMISSIVE DIALING FOR WIRELESS PROVIDERS:

It was noted by an industry member that at the original planning meeting the industry agreed to recommending, if a split was chosen by the commission, an extended permissive dialing period for wireless providers, however this was before LNP and pooling were introduced. With LNP and pooling an extended permissive dialing period could apply to wireline as well as wireless customers (since there are no longer wireless only CO Codes) instead of only wireless as was originally intended. Additionally, when this verbiage was included many cellular handsets had to be manually reprogrammed if the area code changed. Today, there are fewer handsets that must be manually reprogrammed and most are remotely changed, thus not requiring an extended period of time to make the changes. The industry members' letters request that either this verbiage be removed or that the verbiage be changed from extended 10-D permissive dialing to extended 7-D permissive dialing. The specific verbiage at question is as follows: *"However, the Industry participants reached consensus to recommend that permissive ten-digit dialing be extended for up to two years following relief for wireless service providers."*

After discussion of the issue, consensus was reached to remove this sentence from the draft petition.

REVIEW OF DRAFT MEETING MINUTES

Consensus was reached that the draft minutes resulting from this meeting will be distributed to the Industry via NANPA's NAS-NNS system on or before June 2, 2006. Additionally, it was agreed that in lieu of a conference call to review these minutes, industry members would have until June 9, 2006 to contact Joe at (805) 520-1945 or via email at joe.cocke@neustar.biz with any corrections, after that date the minutes will become final.

Adjourn

#

**920 NPA – WISCONSIN
STATUS REVIEW and ADDRESS FILING MEETING
VIA CONFERENCE CALL
May 19, 2006
PARTICIPANTS**

NAME	COMPANY
Carol Tompkins	AT&T
Cheryl Roach	CenturyTel
Lesli Gray	CenturyTel
Joe Cocke	NANPA NPA Relief Planning
Wayne Milby	NANPA NPA Relief Planning
Gary Zahn	NeuStar Pooling Administration
Tim Booth	NeuStar Pooling Implementation
Craig Winters	Nextel
Natalie McNamer	T-mobile
Catherine Palcic	Verizon
Teresa Junkert	Verizon Wireless
Dana Smith	Verizon Wireless
Kathy Bakke	WI PSC

PSC REF#:77597

Public Service Commission of Wisconsin
RECEIVED: 06/19/07, 3:22:15 PM

EXHIBIT I

April 3, 2007

To: All 920 NPA Code Holders and Other Industry Members (Wisconsin)

Re: Conference Call to Address Pending Filing of the Relief Petition for 920 NPA

During the May 19, 2006, industry conference call to address filing of the pending relief petition for the 920 NPA the industry reached consensus to delay filing the relief petition with the Wisconsin Public Service Commission (PSC) until further review of the forecasted exhaust. The industry agreed to meet within 30 days after the release of the April 2007 NRUF to review the status of the NPA and consider filing the petition for relief or sooner if the number of NXX codes reached 100 or less. On March 30, 2007 NANPA assigned 6 NXX codes reducing the number of available codes to 97.

Therefore as a result of reaching the trigger set by the industry and in accordance with the industry agreement to reconvene and address the filing date of the pending relief petition, a conference call has been scheduled as follows:

Date: Monday, April 16, 2007

Time: 2:00 PM Eastern; 1:00 PM Central; 12:00 PM Mountain; 11:00 AM Pacific

Dial-in number: 630-827-6799

Pass code: 6972048 #

Attached are copies of the agenda, the Industry Consensus Process, a 920 NPA-NXX summary report and the 920 NPA Pooling Administration Status Report. An updated copy of the draft 920 NPA relief petition will be provided before the meeting.

If you have any questions, please give me a call at (805) 520-1945.

Regards,

Joseph R. Cocke
Sr. NPA Relief Planner
NANPA

Attachments

INDUSTRY CONSENSUS PROCESS

1/3/2006

ATIS OPERATING PROCEDURES

VERSION 4.0

7 RESOLUTION PROCESS

7.1 Consensus

Consensus is the method used by the ATIS Forums and Committees to reach resolution of Issues, unless specifically otherwise provided for in these Operating Procedures or in the "ATIS Procedures for the Development of an American National Standard".

Consensus is established when substantial agreement has been reached among those participating in the Issue at hand. Substantial agreement means more than a simple majority, but not necessarily unanimous agreement.

Consensus requires that all views and objections be considered, and that a concerted effort be made toward their resolution. Under some circumstances, consensus is achieved when the minority no longer wishes to articulate its objection. In other cases, the opinions of the minority should be recorded with the report of the substantial agreement, or consensus, of the majority.

When there are questions or disputes regarding consensus, leaders or participants should ask an objecting participant(s) to state the rationale for the objection and provide an opportunity for full discussion aimed at achieving full understanding and consideration of the objection.

A participant's silence is perceived as agreement by the committee and its leadership. If participants do not agree, they should be encouraged to speak up and voice their opinion.

POOLING STATISTICS	
<i>Provided By: Cecilia Louie</i>	
ST/NPA:	WI 920
MEETING DATE:	4/16/2007
MEETING SUBJECT:	
<i>Relief Planning</i>	X
<i>Jeopardy</i>	
<i>Jeopardy Status Review</i>	
<i>UA NXXs</i>	
<i>Other</i>	
POOL START DATE (PSD)	4/4/2003
RATE CENTERS	
<i># Total</i>	126
<i># Mandatory</i>	11
<i># Mandatory-Single Service Providers (M*)</i>	0
<i># Optional</i>	115
<i># Excluded</i>	0
BLOCKS ASSIGNED	
<i># Total</i>	152
<i>(For the Last Twelve Months)</i>	
BLOCKS AVAILABLE	
<i>#Total</i>	1217
<i>(As of preparation date: 4/3/07)</i>	
CODES ASSIGNED	
<i># Total</i>	12
<i># for Pool Replenishment</i>	5
<i># for Dedicated Customers</i>	0
<i># for LRNs</i>	7
<i>(For the Last Twelve Months)</i>	
CODES FORECASTED	
<i># Total</i>	4
<i># for Pool Replenishment and Dedicated Customers</i>	4
<i># for LRNs</i>	0
<i>(For the next twelve months)</i>	

PSC REF#: 77598

Public Service Commission of Wisconsin
RECEIVED: 06/19/07, 3:22:15 PM

EXHIBIT J

May 9, 2007

To: All 920 NPA Code Holders and Other Industry Members (Wisconsin)

Re: Final Minutes of April 16 Conference Call to Address Pending Relief Petition

Attached are the final minutes from the April 16, 2007 conference call to review the status of the Wisconsin 920 NPA and to address whether the industry wished to file the pending relief petition with the Public Service Commission of Wisconsin. Also attached are a new set of relief alternative rate center maps showing the latest projected lives and a rate center / county map showing cities with a population greater than five thousand.

If you have any questions, please give me a call at (805) 520-1945.

Regards,

Joseph R. Cocke
Sr. NPA Relief Planner
NANPA

Attachments

**920 NPA – WISCONSIN
RELIEF PLANNING FOLLOW-UP
FINAL MEETING MINUTES
VIA CONFERENCE CALL
April 16, 2007**

WELCOME, INTRODUCTIONS & OBJECTIVE OF MEETING

Joe Cocke, Senior NPA Relief Planner – NANPA, opened the meeting with introductions and the objective of the meeting. A list of attendees can be found in Attachment #1.

REVIEW CONSENSUS PROCESS, MEETING MINUTES AND STATEMENTS FOR THE RECORD

Mr. Cocke stated that the ATIS (Alliance for Telecommunications Industry Solutions) approved industry consensus process would be followed. He reviewed the consensus process and explained how consensus is determined. Mr. Cocke explained that silence on the part of the participants will be considered agreement with a proposal, based on those on the call at the time consensus is called. In addition, Mr. Cocke stated that the minutes would be comprised of consensus items, and that issues not captured by consensus could be expressed in the form of a Statement for the Record, which could be conveyed at any point during the meeting.

PURPOSE OF THE CALL

Mr. Cocke recapped the last review meeting for the 920 NPA relief was held May 19, 2006. During that meeting the industry participants reached consensus to postpone filing a relief petition with the Wisconsin Public Service Commission (“Commission”) until review of the next NRUF forecast in April 2007, and NANPA would convene a meeting within thirty days of the publication or sooner if the number of remaining codes reached 100 or less. Joe stated the number of codes fell below 100 on March 30, 2007. This meeting is to evaluate the status of the 920 NPA numbering resources and determine if the petition should be filed with the Commission. The October 2006 NRUF forecast reflects the 920 NPA exhaust is at 2Q2010, Joe stated it is not expected to change with the April 2007 NRUF forecast. Joe also stated that an updated draft petition with updated projected lives using the current forecast and the April LERG NXX assignments has been provided for industry review and approval.

CO CODE ADMINISTRATION STATUS OF THE 920 NPA

Mr. Cocke reviewed the 2006 and 2007 code assignment history for the 920 NPA (see below). He also reported that as of April 16, 2007 there were 96 NXX codes available for assignment, 683 assigned NXX codes and 21 unavailable NXX codes. He also noted the NPA is not in jeopardy or rationing. He stated the following are the unassignable codes: N11s, 200, 274, 353, 444, 500, 555, 700, 900, 920, 950, 958, 959, and 976.

2006 History: 24 assignments and 4 codes returned

2007 History: 12 assignments and 1 code returned YTD

Jan	Feb	Mar	Apr	Total
1	2	7	2	12

Assignments up through April 13, 2007

POOLING ADMINISTRATION STATUS OF THE 920 NPA

Ms. Cecilia Louie, NeuStar Pooling Implementation, reported that number pooling in the 920 NPA started on April 4, 2003. As of April 3, 2007, the Pooling Administrator has assigned 166 blocks to service providers in the 920 NPA in the past year, and there are currently 1263 blocks available for assignment. She also mentioned there are of the total 126 rate centers: 11 rate centers are mandatory pooling, and 115 are optional pooling rate centers. The pooling administration has a demand of two codes forecasted for the next 12 months: 2 for pools. Of the 18 codes assigned in the past 12 months, 11 were for pool replenishment and 7 were for LRNs.

REVIEW OF THE RELIEF ALTERNATIVES

Joe provided the following overview of the relief alternatives and the projected lives:

Alternative # 1 – all service overlay –is the industry’s recommended relief

Alternative # 2 – geographic split along LATA lines is the industry’s split recommendation if the PSC desires a split.

Alternative	Projected Lives	
Alt. # 1 – Overlay	24 years	-
Alt. # 2 – Split	Area A = 20 years	Area B = 30 years
Alt. # 3 – Split	Area A = 20 years	Area B = 29 years
Alt. # 4 – Split	Area A = 28 years	Area B = 22 years

ITEMS FOR DISCUSSION

Joe noted that he found three paging codes that are grandfathered in the Milwaukee Zone 1 rate center in the 414 NPA (920)-692-990 & 998). NANPA has no record of why they were allowed to be rated outside the NPA. Joe stated that if the PSC desires to implement a geographic split they will need to determine the disposition of these codes.

Also, if a split is chosen, the PSC must decide which side of the split line must change to the new NPA since the industry made no recommendation.

Joe also mentioned in the original planning meeting the industry decided not to make any recommendations for an implementation plan until the PSC decides on a relief option.

FILING RELIEF PETITION WITH THE WISCONSIN PSC

Discussion ensued regarding the need to file the pending relief petition with the Wisconsin PSC for the 920 NPA. Joe stated that the forecasted exhaust is almost within the 36-month period that a relief petition would normally be filed. After considering the current status of the 920 NPA, a proposal was made, and consensus reached to delay filing of the petition until approximately 30 days after publication of the October 2007 NRUF or sooner if we get down to 80 codes. Additionally, the updated draft petition was reviewed and approved.

COMMENTS FROM PSC STAFF

Joe inquired of Kathy Bakke of PSC staff what kind of regulatory process the industry might expect. Kathy stated the commission would most likely conduct public meetings to get public input after the petition is filed and before a decision is made. Staff also inquired of the descriptions of the split lines in the petition. Joe stated that it could be clarified.

OPEN DISCUSSION ITEMS

Joe mentioned the 715 NPA, which is adjacent to the 920, covers at least half of the state and is forecasted to exhaust before the 920. Joe inquired if there are any E-911 tandem router issues that need to be resolved before another NPA is introduced in the 920 NPA. He stated this might be an issue since the 715 NPA is slated to get relief before the 920 and the industry should investigate the issue.

REVIEW OF DRAFT MEETING MINUTES

Consensus was reached that the draft minutes resulting from this meeting will be distributed to the Industry via NANPA's NAS-NNS system on or before April 30, 2007. Additionally, it was agreed that in lieu of a conference call to review these minutes, industry members would have until May 7, 2007 to contact Joe at (805) 520-1945 or via email at joe.cocke@neustar.biz with any corrections, after that date the minutes will become final.

Adjourn

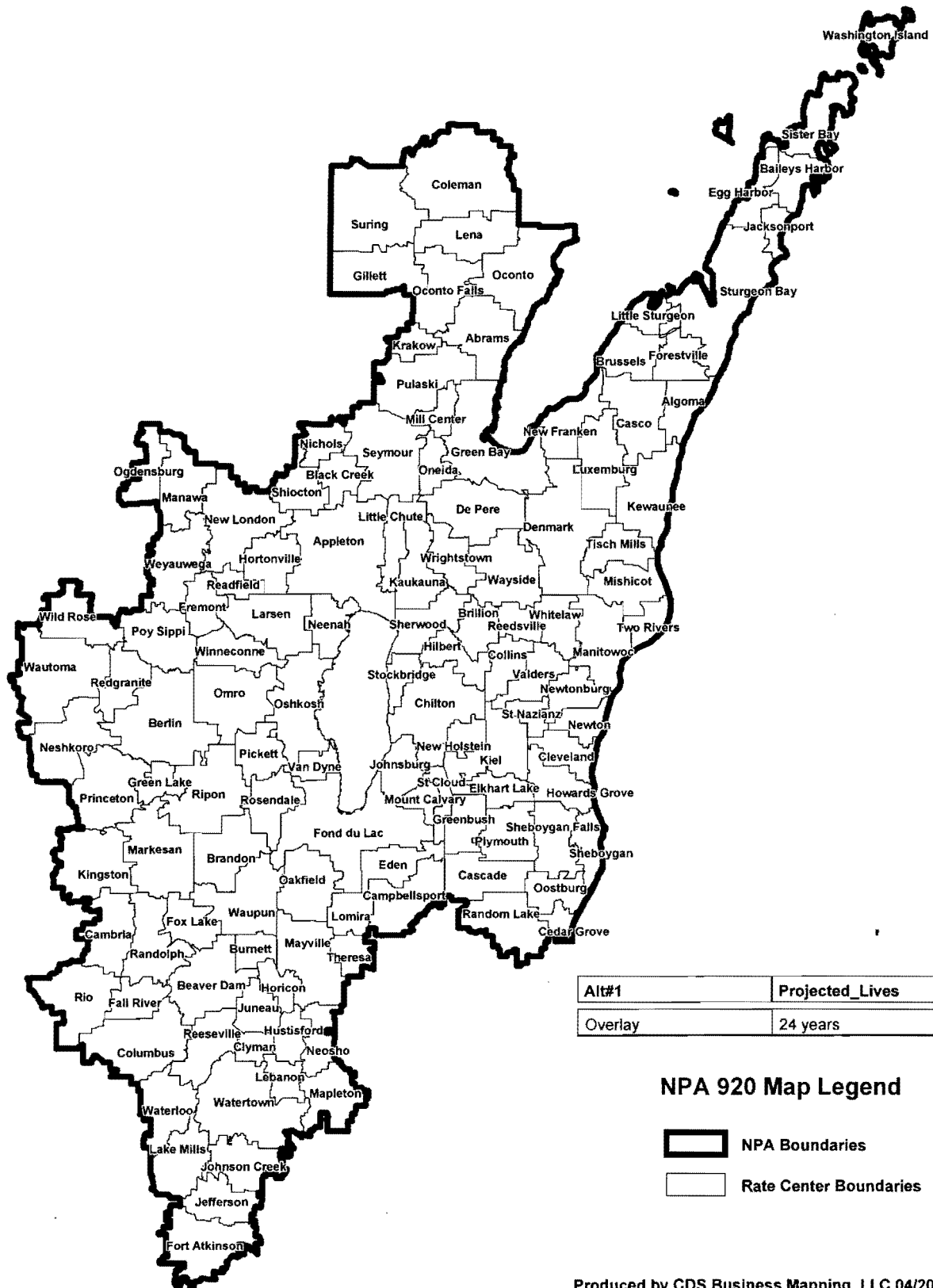
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**920 NPA – WISCONSIN
STATUS REVIEW and ADDRESS FILING MEETING
VIA CONFERENCE CALL
April 16, 2007
PARTICIPANTS**

NAME	COMPANY
Cliff Boswell	Alltel
Marcy Baxter	AT&T
George Guerra	AT&T
Holly Kuester	Charter Communications
Ann Meldahl	Century Tel
Cheryl Roach	Century Tel
Lesli Gray	Century Tel
Todd Stein	Century Tel
Libby Casillas	Cingular
Joe Cocke	NANPA NPA Relief Planning
Wayne Milby	NANPA NPA Relief Planning
Genevieve Paulino	Pooling Administration
Cecilia Louie	Pooling Implementation
Charlotte Holden	T-mobile
Jean Pauk	TDS Telecom
Aubrey Anderson	Verizon
Mike Wirl	Verizon
Yun Lee	Verizon
Beverly Hamilton	Verizon
Joyce Dingman	WI PSC
Gary Evenson	WI PSC
Kathy Bakke	WI PSC

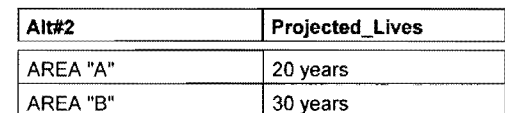


NEU STAR



Produced by CDS Business Mapping, LLC 04/2007

NEU STAR



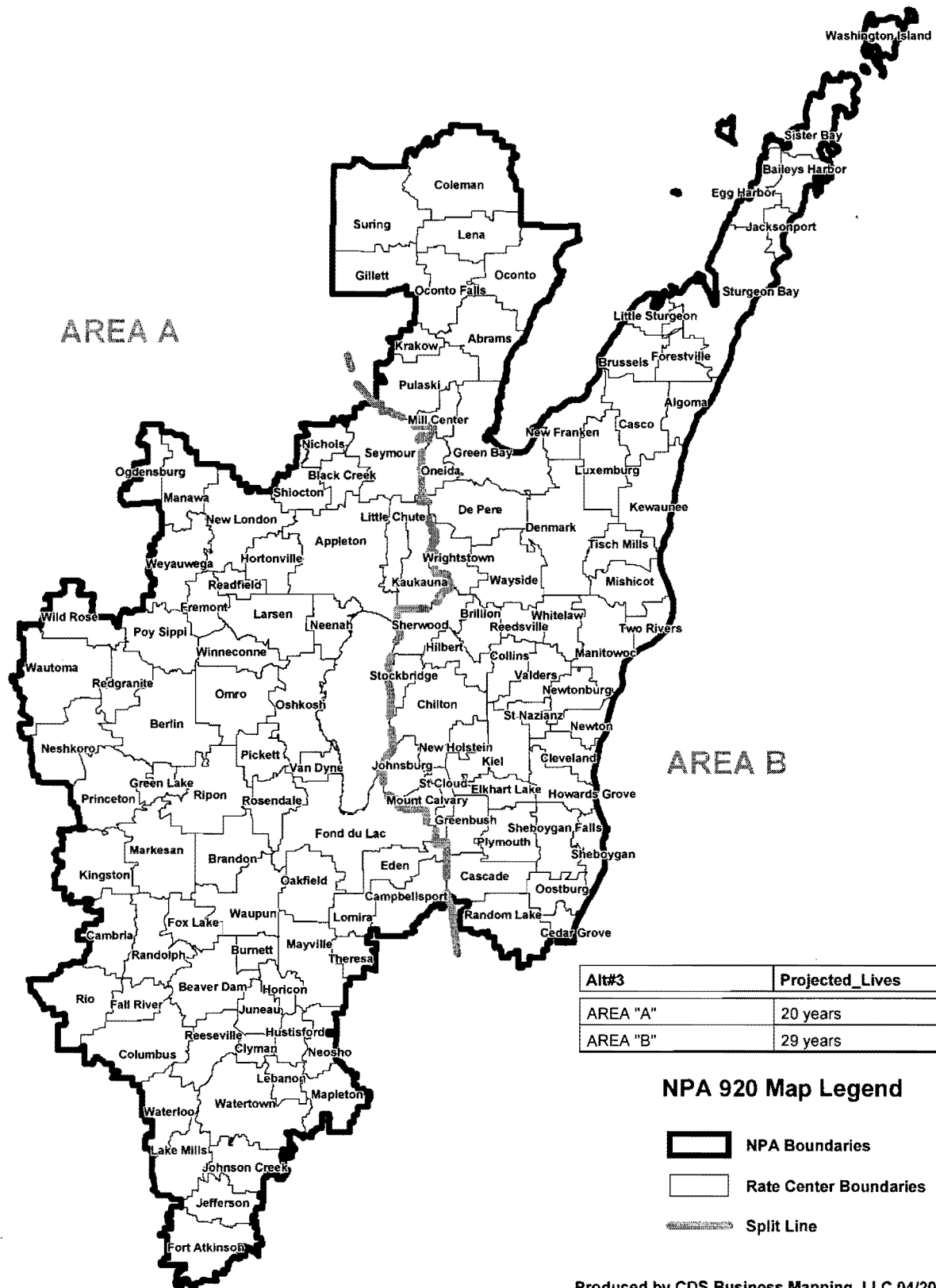
 **NPA Boundaries**

 **Rate Center Boundaries**

 **Split Line**




**NPA 920 Rate Center Map
ALTERNATIVE #3
GEOGRAPHIC SPLIT**

NEU STAR



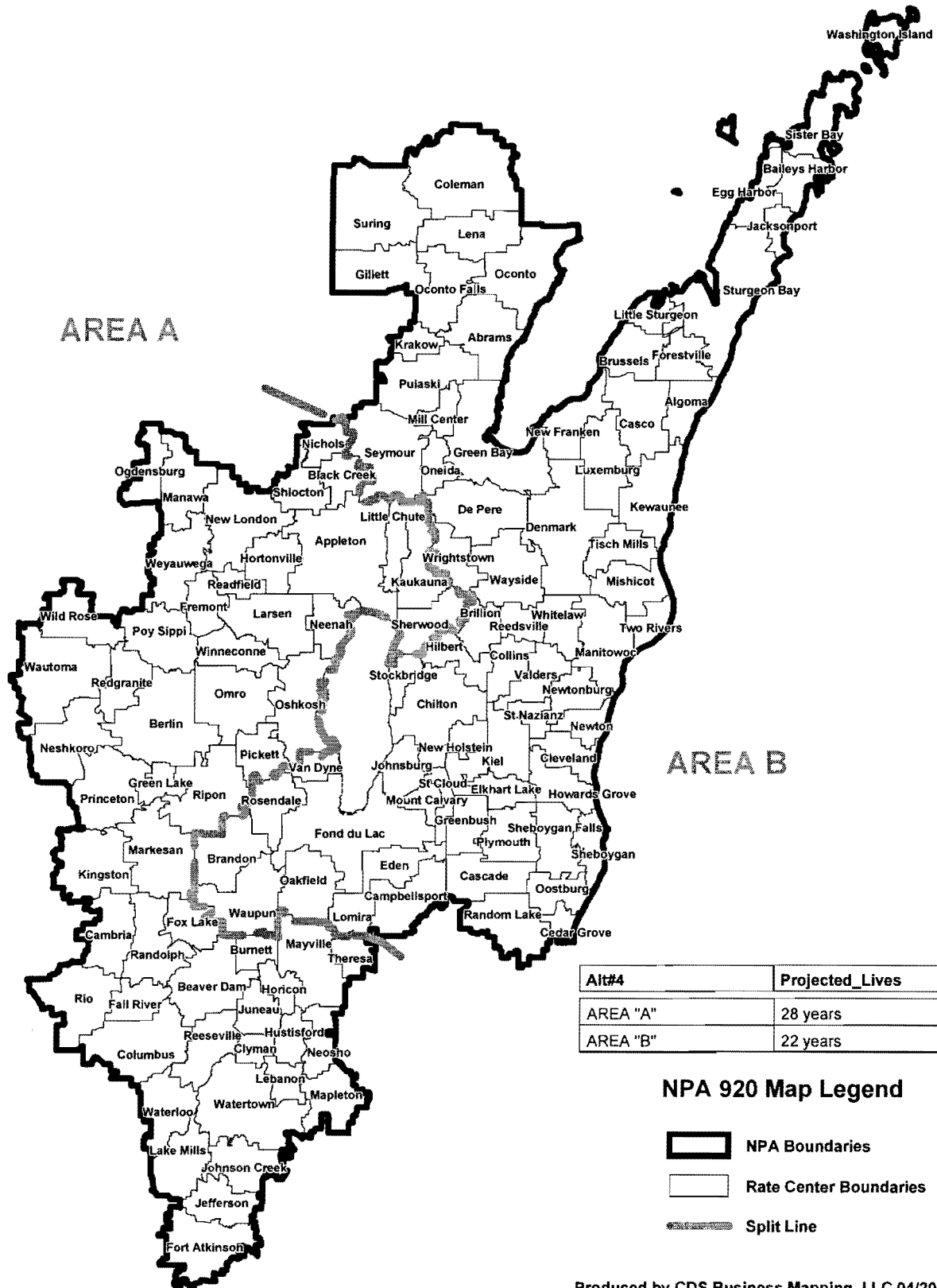
Alt#3	Projected_Lives
AREA "A"	20 years
AREA "B"	29 years

NPA 920 Map Legend

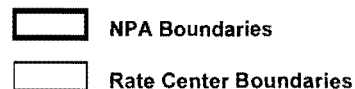
-  NPA Boundaries
-  Rate Center Boundaries
-  Split Line

**NPA 920 Rate Center Map
ALTERNATIVE #4
GEOGRAPHIC SPLIT**

NEU STAR



NEU STAR



PSC REF#:77599

Public Service Commission of Wisconsin
RECEIVED: 06/19/07, 3:22:15 PM

EXHIBIT K

June 7, 2007

To: All 920 NPA Code Holders and Other Industry Members (Wisconsin)

Re: Final Minutes to Industry Conference Call to Reopen a Consensus Item and Address Filing of the Petition for Approval of the 920 NPA Relief Plan

Attached are the final minutes to the May 29, 2007, industry conference call to reopen a consensus item and to address filing of the pending relief petition for the 920 NPA. The industry reached consensus to file the relief petition with the Wisconsin Public Service Commission (PSC). NANPA will file the relief petition in the near future and distribute a copy of it via NNS.

If you have any questions, please give me a call at (805) 520-1945.

Regards,

Joseph R. Cocke
Sr. NPA Relief Planner
NANPA

C: Gary Evenson – WI PSC Staff

Attachments

**920 NPA – WISCONSIN
REOPEN CONSENSUS and ADDRESS FILING RELIEF
FINAL MEETING MINUTES
VIA CONFERENCE CALL
May 29, 2007**

WELCOME, INTRODUCTIONS & OBJECTIVE OF MEETING

Joe Cocke, Senior NPA Relief Planner – NANPA, opened the meeting with introductions and the objective of the meeting. A list of attendees can be found in Attachment #1. Joe mentioned since this is our quality survey month attendees would receive an electronic survey following this meeting.

REVIEW CONSENSUS PROCESS, MEETING MINUTES AND STATEMENTS FOR THE RECORD

Mr. Cocke stated that the ATIS (Alliance for Telecommunications Industry Solutions) approved industry consensus process would be followed. He reviewed the consensus process and explained how consensus is determined. Mr. Cocke explained that silence on the part of the participants will be considered agreement with a proposal, based on those on the call at the time consensus is called. In addition, Mr. Cocke stated that the minutes would be comprised of consensus items, and that issues not captured by consensus could be expressed in the form of a Statement for the Record, which could be conveyed at any point during the meeting.

PURPOSE OF THE CALL

Mr. Cocke recapped the last review meeting for the 920 NPA relief was held April 16, 2007. During that meeting the industry participants reached consensus to postpone filing a relief petition with the Wisconsin Public Service Commission ("Commission") until review of the next NRUF forecast in October 2007, and NANPA would convene a meeting within thirty days of the publication or sooner if the number of remaining codes reached 80 or less. On May 10, 2007 NANPA received two letters from industry members requesting an industry meeting to reconsider this consensus item and to file the relief petition now. This meeting is to determine if the industry wishes to reopen the consensus item of waiting to file. If consensus is reached to reopen and then if consensus is reached to file the relief petition now, we will review the draft petition during this meeting as well. The April 2007 NRUF forecast reflects the 920 NPA exhaust is at 2Q2010.

CO CODE ADMINISTRATION STATUS OF THE 920 NPA

Mr. Cocke reviewed the 2006 and 2007 code assignment history for the 920 NPA (see below). He also reported that as of May 29, 2007 there were 93 NXX codes available for assignment, 686 assigned NXX codes and 21 unavailable NXX codes. He also noted the NPA is not in jeopardy or rationing. He stated the following are the unassignable codes: N11s, 200, 274, 353, 444, 500, 555, 700, 900, 920, 950, 958, 959, and 976.

2006 History: 24 assignments and 4 codes returned

2007 History: 15 assignments and 1 code returned YTD

Jan	Feb	Mar	Apr	May	Total
1	2	7	3	2	15

Assignments up through May 29, 2007

POOLING ADMINISTRATION STATUS OF THE 920 NPA

Mr. Tim Booth, NeuStar Pooling Implementation, reported that number pooling in the 920 NPA started on April 4, 2003. As of May 23, 2007, the Pooling Administrator has assigned 178 blocks to service providers in the 920 NPA in the past year, and there are currently 1298 blocks available for assignment. He also mentioned there are of the total 126 rate centers: 11 rate centers are mandatory pooling, and 115 are optional pooling rate centers. The pooling administration has a demand of three codes forecasted for the next twelve months: 2 for pool replenishment and 1 for LRN. Of the 23 codes assigned in the past twelve months, 15 were for pool replenishment and 8 were for LRNs.

REACH CONSENSUS ON REOPENING PREVIOUS CONSENSUS ITEM

Joe asked the question if anyone was opposed to reopening the consensus item from the April 16th meeting to wait until the October NRUF is published. Consensus was reached to reopen this consensus item.

REACH CONSENSUS ON FILING PENDING RELIEF PETITION

A discussion took place on the facts surrounding the adjacent 920 and 715 NPAs having exhaust dates six months apart and that relief decisions would be needed sooner to be able to schedule the implementation intervals to avoid coincidental relief projects. It was also mentioned the PSC needed the relief petition filed to move forward on any public meetings this summer. Therefore, a motion was made and consensus was reached not to wait until the next NRUF forecast but to file the relief petition now.

REVIEW OF THE RELIEF ALTERNATIVES

Joe provided the following overview of the relief alternatives and the projected lives:

Alternative # 1 – all service overlay –is the industry’s recommended relief

Alternative # 2 – geographic split along LATA lines is the industry’s split recommendation if the PSC desires a split.

Alternative	Projected lives	
Alt. # 1 - Overlay	24 years	-
Alt. # 2 - Split	Area A = 20 years	Area B = 30 years
Alt. # 3 - Split	Area A = 20 years	Area B = 29 years
Alt. # 4 - Split	Area A = 28 years	Area B = 22 years

REVIEW OF RELIEF PETITION

The updated draft petition was reviewed and approved to be filed once these minutes become final so they may become part of the filing.

COMMENTS FROM PSC STAFF

Kathy Bakke, PSC Staff, expressed appreciation to the industry for going ahead with the filing. She also stated they have an open door policy and encouraged anyone to give her a call if they have any concerns.

REVIEW OF DRAFT MEETING MINUTES

Consensus was reached that the draft minutes resulting from this meeting will be distributed to the Industry via NANPA's NAS-NNS system on or before June 1, 2007. Additionally, it was agreed that in lieu of a conference call to review these minutes, industry members would have until June 7, 2007 to contact Joe at (805) 520-1945 or via email at joe.cocke@neustar.biz with any corrections, after that date the minutes will become final. Once the minutes become final NANPA will file the relief petition with the PSC of Wisconsin.

Adjourn

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**920 NPA – WISCONSIN
REOPEN CONSENSUS and ADDRESS FILING MEETING
VIA CONFERENCE CALL
May 29, 2007
PARTICIPANTS**

NAME	COMPANY
George Guerra	AT&T
Ann Meldahl	Century Tel
Steve Mack	Century Tel
Connie Briggs	Century Tel
Chuck Whalen	Century Tel
Lesli Gray	Century Tel
Joe Cocke	NANPA NPA Relief Planning
Wayne Milby	NANPA NPA Relief Planning
Joe Rano	NANPA Code Administration
Beth Sprague	NANPA Code Administration
Linda Hymans	NeuStar Pooling Administration
Genevieve Paulino	NeuStar Pooling Administration
Tim Booth	NeuStar Pooling Implementation
Aubrey Anderson	Verizon
Dyan Adams	Verizon
Jena Downs	Verizon
Mike Wirl	Verizon
Beverly Hamilton	Verizon
Dana Crandall	Verizon Wireless
Kathy Bakke	WI PSC

715 COMMENTS

920 COMMENTS

INDUSTRY COMMENTS

CHARTS

Comments Received for the 715 Area Code

No.	CONTACT INFORMATION	SUPPORT SPLIT OR OVERLAY	COMMENT	Business or Residential
1	Marshfield Clinic Douglas Redding 1000 North Oak Avenue Marshfield WI 54449	Overlay	On behalf of the 766 physician specialists and 5700 employees who care for Marshfield Clinic patients in our 41 centers throughout north central Wisconsin I am writing to express our support for Alternative #1 "All Services Distributed Overlay" for the Public Service Commission's proposed changes to the existing 715 area code. In fiscal year '06 Marshfield Clinic saw approximately 360,000 unique patients accounting for 1.8 million outpatient visits. Most of our patients come from the 715 area code area. Because our 41 centers are connected by our own information systems technology which includes our electronic medical record appointment insurance billing phone and paging systems adopting the overlay alternative going forward will provide the most cost effective and seamless transition to a new area code for our patients and staff. The costs of reprogramming these components of our communications systems would be substantial. Please consider our request the overlay alternative as the Public Service Commission completes its analysis of public commentary and decides which alternative best serves the residents of north central Wisconsin. Please feel free to contact me if you have additional questions at 715-221-8690.	Business
2	City of Stevens Point Andrew Halverson Mayor 1515 Strong's Avenue Stevens Point WI 54481	Geographic Split	On behalf of the City of Stevens Point I am writing in response to the Public Service Commission's (PSC) proposed changes to the existing 715 area code. The city of Stevens Point would like to express our strong preference for a geographic split alternative that retains the 715 area code for Stevens Point. We have the University of Wisconsin-Stevens Point here with over 1200 employees in the city and surrounding communities and changing the 715 area code would create confusion with the public and private sector constituents while increasing the costs of their telecommunications operating expenses. We also have numerous employers including our largest Sentry Insurance with about 2700 employees in Stevens Point. They service 1.5 million individual and business customers. Keeping the 715 area code allows all these employers to avoid any confusion and expense to their customers and workforce that would occur if they are forced to change all their existing numbers or add a second area code under the overlay scenario. Lastly and perhaps most importantly the City of Stevens Point is home to a booming segment of the population that speaks English as a second language as well as the highest per capita Senior Care enrollment population in the State. An area code change could potentially cause a great deal of confusion for these populations; please consider keeping the entire area of Stevens Point in the 715 area code and our immediately surrounding area. Thank you very much for your time and attention to this matter. If you have any questions or should you require any additional information please do not hesitate to contact me.	Business
3	James Stitzlein 1800 North Point Drive Stevens Point WI 54481	Geographic Split	On behalf of Sentry Insurance I am writing in response to the Public Service Commission's (PSC) proposed changes to the existing 715 area code. Sentry would like to express our strong preference for a geographic split alternative that retains the 715 area code for Stevens Point where Sentry is headquartered. Sentry has over 2700 employees in Stevens Point and services 1.5 million individual and business customers. Keeping the 715 area code allows us to avoid any confusion and expense to our customers and workforce that would occur if Sentry was forced to change all of our existing numbers or add a second area code under the overlay scenario. Again Sentry Insurance requests that the Commission recommend and implement a geographic split that retains the 715 area code for Stevens Point. If you have any questions or would like to discuss this matter further please feel free to contact me at 715-346-6689.	Business

Comments Received for the 715 Area Code

No.	CONTACT INFORMATION	SUPPORT SPLIT OR OVERLAY	COMMENT	Business or Residential
4	Joyce Booth 2040 S. Baker Road Balsam Lake WI 54810	Geographic Split	We do not agree with an overlay for new telephones in our area. I feel that a geographic split would be much less confusing for telephone use. Thank you!	Residential
5	Thomas Miller UWSP Stevens Point WI 54481	Geographic Split	On behalf of the University of Wisconsin - Stevens Point (UWSP) I am writing in response the Public Service Commission's (PSC) proposed changes to the existing 715 area code. UWSP would like to express our strong preference for a geographic split alternative that retains the 715 area code for Stevens Point. UWSP is the second largest employer in Stevens Point with 1200 employees in the city and its surrounding communities. Maintaining the 715 area code allows us to avoid any confusion with out private and public sector constituents while keeping our telecommunication costs within our budget parameters. Over the past decade UWSP has seen its share of state support decline from 38% to 29% and hence our concerns over any additional telecommunications operating expenses. thank you for your time and we appreciate the Commission's consideration.	Business
6	Powercom 1807 N. Center Street Beaver Dam WI 53916	Overlay	The overlay is significantly less expensive to implement for consumers and for the Telecommunications industry. The geographic split absolutely has some positive attributes however they do not out weight the additional expenses involved to implement such a change. The programming involved for us as a CLEC to implement the overlay is drastically less than that of the geographic split. The geographic split also inflicts considerable hardship on business customers who must change their phone number and everything that markets to their customer base.	Business
7	James W. Pratt Ila June Brown-Pratt 519 East Walnut Street River Falls WI 54022	Geographic Split	My wife and I strongly favor the geographical division of the 715 area with 715 kept by one side and a new area code assigned to the other. While there will be a temporary period of adjustment in the region with the new area code there will be no adjustment necessary in the region that retains the 715 area code. Because of the frequent assignment of new area codes across Wisconsin and Minnesota and across the U.S. people are used to this kind of change. The overlay system not only remains forever confusing because a single community may have two different area codes but it also will require that all calls including local calls that presently require seven-digit dialing must use all ten digits because local numbers may have different area codes. Additionally the geographical division system has been used exclusively for area code relief in both Minnesota and Wisconsin so people are used to that process whereas the overlay system is unfamiliar and confusing.	Residential
8	Steve Incha PO Box 1478 Rhineland WI 54501	Overlay	I THINK AN OVERLAY OF THE CURRENT 715 AREA CODE WOULD BE BEST SO WE WOULD NOT NEED TO CHANGE OUR NUMBERS.	Residential
9	Peter Johnson 1214 Oakes St. Marienette WI 54143-0076	Overlay	As a telephone consumer it is my preference that the area code relief in northern Wisconsin within the 715 area should be established as an OVERLAY and NOT a geographical split. As in the past with other area code reliefs in Wisconsin geographical splits have occurred which had allowed the "more populated" cities and areas to retain the existing area code but forced the more rural areas to have to change. I prefer to not see this occur anymore. I believe that new area codes that are to be established should affect the new telephone subscribers regardless of location and not the existing ones in only certain geographical areas. Additionally changes of company and persona letterhead can become costly for all that are affected mainly small business owners.	Residential

Comments Received for the 715 Area Code

No.	CONTACT INFORMATION	SUPPORT SPLIT OR OVERLAY	COMMENT	Business or Residential
10	Gary Whitney 7727 Maas Drive Verona WI 53593	Geographic Split	I would like to go on the public record in favor of an area code 715 split versus an overlay - thank you	Residential
11	Virginia Elsen and Jose Ocariz W9098 Jellen Rd Spoonerville WI 54801	Geographic Split	We ask that you do the most logical thing in splitting up the 715 area code or any other area code: split it up geographically. Draw a line and put those in one side of the line in one area code and those in the other in another area code. It would be absolutely ridiculous to have people all over the place in different area codes. It would be ridiculous to have to dial 10 digits just to dial your neighbors in the same town. So if there is inconvenience at first in changing area codes it will be alleviated over time. Having to dial the 10 digits for neighbors would be a pain forever.	Residential
12	Henry Perfect 7750 Indian Shores Rd Woodruff WI 54568	Overlay	What's the possibility of an digital overlay. All businesses and residence retain the 715 and all cell phones fax lines or dedicated digital communication lines would use a new area code. These except for fax numbers are usually not published and it should be easy for anyone calling to one of these numbers to recall and to dial the new area code. Personally I have been trying to obtain VOIP service and have been unable to port my local number to any service. I can not take advantage of this new service and I'm assuming that this realignment is the problem. If I were given the opportunity to take a new area code so I could obtain that service I would. Thanks.	Residential
13	Brad Worcester 9240 University Ave NW #211 Coon Rapids MN 5548	Preference Not Disclosed	I don't live in the 715 area code but I have relatives that do! Here in the Twin Cities we have had three area codes in addition to 612 since 2000 or 2001 meaning we all have to dial 10 numbers so yes to someone in Edina MN if you're in Blaine(763) you have to dial 952. or to call someone in Mappewood from Richfield (612) you have to dial 651 that's right our friends in Minneapolis Richfield Fort Snelling and Saint Anthony Village kept 612 The area codes roughly in the West metro divide roughly along 394 so if your in Maple Grove Coon Rapids Rogers Fridley or Mounds View in the north and west metro the area code is 763 south of 394 such as Edina St. Louis Park Bloomington or Burnsville in the south and west metro the area code is 952 and Saint Paul and it's suburbs such as Roseville Eagan Apple Valley new Brighton or Woodbury the area code is 651. and Like I said earlier Minneapolis Richfield St. Anthony and Fort Snelling kept 612. So we have to call extra numbers if we want to call Woodbury from Maple Grove or to make a call to Rogers from Burnsville. So I think sooner or later its going to come to that point for our friends in Eau Claire or Hudson even if you replace 715 with a whole new one or just divide it in half.	Residential
14	Mary Laura Rachford 29032 Treasure Island Ct Danbury WI 54830-8691	Geographic Split	I believe strongly that the 715 area code should be split geographically. The northwest Wisconsin area is strongly identified with Minnesota's Twin Cities rather than greater Wisconsin. It would be a burden to call my next door neighbor or Webster WI using 10 digits if the PSC decides on an overlay. While living in Brooklyn Park MN the entire Twin Cities went through area code re-identity. What a learning curve with four new area codes! Not that the 715 code would undergo such a change I hope!!! Why in the long run would we want to subject the populace with confusion with an overlay?	Residential
15	Joleen Jensen 1583 County Line Street Turtle Lake WI 54889	Geographic Split	I am writing to inform you that I am in favor of the 715 split instead of the overlay system. The split seems to be the easiest option now and in the future. I propose retaining the 715 area code in the western part of the area code. I think this option will cause the least disruption to the largest number of people. Thank you!	Residential

Comments Received for the 715 Area Code

No.	CONTACT INFORMATION	SUPPORT SPLIT OR OVERLAY	COMMENT	Business or Residential
16	Noreen Shubert 122 South Avenue Crivitz WI 54114	Geographic Split	I thing the geographic split is a better option than an overlay for the 715 are code relief. My biggest concern with an overlay is the need to dial all 10 digits even for a local call. While this may not seem to be a problem for many customers I believe the elderly may have a problem remembering to do this as well as remembering new phone numbers that have the anew area code. As a school district employee I also wonder about the extra effort needed to dial student home phone numbers or how difficult it will be for a small child to remember all 10 digits for a parents' home and work phone numbers. I also wonder if consideration been given to how each of the plans may affect any FUTURE area code relief plans.	Residential
17	Jacquelyn J Lahn 301 Water Street Ste 1 Eau Claire WI 54703	Overlay	I support the Overlay option. Splitting the service area and facing the prospect of having to change all of my contact information and advertising will be costly in both the reprinting of stationary business cards and print advertising but time consuming in making sure that all advertising and client contact information is updated.	Residential
18	Todd J. Robertson 6160 Joanne Lane Altoona WI 54720	Geographic Split	I am for the geographical overlay solution.	Residential
19	Mark Schley Foxboro Property Management 2396 Hallie Road Chippewa Falls WI 54729	Overlay	As a small business owner a key part of my business is expenses. Much like any business expenses must be carefully monitored and addressed even more so when you are a small business owner. My thoughts on this matter are that an overlay solution would have the least amount of impact on financially for me as a small business owner. One has to look at the cost associated with changing phone numbers after years of advertising and marketing those numbers the initial expense which can be great but the impact on the business from losing potential clients. A geographical solution to this matter in my opinion would cause undo financial hardship on small business. I hope that you take my comments under consideration and that careful though is given to the burden that a geographical solution would cause. Thank You	Business
20	Charles P. Forbes 7921 North Star Lake Road PO Box 1157 Star Lake WI 54561-1157	Overlay	I strongly support the overlay proposal. Allowing all existing customers to avoid changing their current telephone number is a significant saving in manpower and resources. The strongest argument against the overlay is that it mandates 10-digit dialing. When I am not in Wisconsin during the summer I live in an overlay area in Maryland (410/433). From personal experience I can say that ten-digit dialing is no problem. Furthermore ten-digit dialing is likely to be in everyone's future even if the 715 area code is split; Cell phone protocols and the growing tendency to provide unlimited long distance service packaged with local service will inevitably lead larger and larger number of users to ten-digit dialing. To force half the customers in the 715 are to change their numbers so that we can retain seven digit dialing is a false promise. I hate to admit it but I can remember when seven-digit dialing was introduced despite cries of annoyance it has proven to be "no big deal". Ten-digit dialing will be the same.	Residential

Comments Received for the 715 Area Code

No.	CONTACT INFORMATION	SUPPORT SPLIT OR OVERLAY	COMMENT	Business or Residential
21	Joan and Norris Ross 7365 Wheeler Island Rd Three Lakes WI 54562	Geographic Split	We would like to express support for the SPLIT plan. We lived in Brookfield WI when the area code was changed from 414 to 262. The transition was easy. Whenever someone dialed our old 414 - number a voice announced the area code was changed. At first we were concerned that dialing from 414 to 262 represented a long-distance fee. This was not true as you can call anywhere between 414 and 262 and there is no special charge. We presume the same would be true splitting 715. We would be displeased with the OVERLAY plan because most of the people we call are close by and would likely be in our same area code. With this plan we would be required to dial the area code with every call. North central Wisconsin is more heavily populated with older citizenry who might become confused with more dialing. As far as how to split is concerned we really have no opinion other than to suggest you might look at the larger cities that would have more business locations (who would have the added expense of changing letterhead and business cards)	Residential
22	Michael Ciriacks 1088 Browndeer Ave Friendship WI 53934	No Preference Disclosed	Hello PSC The center part of the state should also be looked at including the 608 area in creating a new area code. Taking exchanges in the 715 920 and 608 area codes to make a new area code will solve problems of number shortages. Allowing cell phone companies 1000 numbers will solve more shortages. As time marches on technology changes large blocks of reserved numbers are not needed. Sitting on 3000 or 6000 numbers that are not being used is not needed.	Residential
23	Lana Luhm E2465 Kirk Drive Eau Claire WI 54701	Geographic Split	I prefer the geographical split because I do not want to have to dial 10 digits to reach a local number	Residential
24	Bryan Kowalczyk 12405 Powers Court Ballwin MO 63131	Overlay	I vote to have 715 be an overlay and not a split.	Residential
25	Paul A. Kuhn P.E. 6206 Nordic Shore Drive Lake Tomahawk WI 54539	Geographic Split	The P.S.C. should split the existing 715 area code service area into two service areas and not create an overlay area code in the existing 715 service area. Splitting the existing 715 service area into two is a basic application of the KISS rule - Keep it Short and Simple. When the service area is split in two telephone customers may continue to make local phone calls by dialing seven numbers and not ten as would be required with an overlay. this is certainly short! When the service is split in two all telephone customers in each area will be served by the same are code. This is certainly simpler than having two area codes in the same town or worse yet in the same building or company! I lived through the dividing of the 312 area code in the Chicago metropolitan area. Granted there was some adjustment and getting used to required when we went from 312 to 708 to 847 but all that was minor compared to the inconvenience of 10 digit dialing and confusion from overlay area codes. Those folks and businesses who will get a new area code will quickly make the adjustment and get on with life. It is no big deal to change area code numbers on business cards and letterheads which can easily be planned when ordering the next printing. Thank you for the opportunity to comment.	Residential

Comments Received for the 715 Area Code

No.	CONTACT INFORMATION	SUPPORT SPLIT OR OVERLAY	COMMENT	Business or Residential
26	Gayle Krecklow 3305 Nimitz Street Eau Claire WI 54701	Geographic Split	As a means of providing relief for the 715 area code I am in favor of geographic splitting vs. an overlay.	Residential
27	John Stupak 2228 Windsong Ct. Eau Claire WI 54703	Geographic Split	I believe that the split is a better situation for the area....10 digit calling may be in the future at some point but at the moment would cause huge problems in understanding for a lot of people particularly the elderly. It would also keep this area of Wisconsin in the mainstream of common dialing method. I believe that either of the two vertical splits (#2 or &6) would most reflect the "identifying factor" of local media municipality or region. Upholding that identification will go a long way toward maintaining the comfort level of the local citizenry.	Residential
28	Karen Hauck 1305 Pershing St. Eau Claire WI 54703	Geographic Split	Please don't have a combined area codes. I don't want to have to think about if my neighbor has a different area code than me. I really don't care about having to forward my contacts new information if we get changed. I just want everyone in my area to be in the same area code.	Residential
29	Alex Birkholz 468 Grand Avenue New Richmond WI 54017	Geographic Split	I encourage the PSC to use the geographic split method of solving the 715 area code issue. The overlay solution makes it difficult for users to know where they are calling and if they will incur a fee from their telecommunications provider.	Residential
30	Libby Stupak 2228 Windson Ct Eau Claire WI 54703	Geographic Split	I feel that the geographic split is the best way to go and eliminate the need to dial the area code for local numbers. I feel this would cause the least amount of confusion.	Residential
31	Vesta Ottosen 4353 LaSalle Street Eau Claire WI 54703	Overlay	Please record my desire to retain the 715 area code in my area and that I favor the 10 digit dialing option as opposed to changing the area code. There is a huge ramification to businesses who have to change stationary business cards and advertising with all media that is in place. The cost will be tremendous. Personally....there are huge quantities of people who have cell phone numbers stored for business purposes that would need to be changed.	Residential
32	Mary Taggatz 419 Hampton Court Altoona WI 54720	Geographic Split	I am in favor of the geographic split method of creating a new area code. It would be much more convenient and certainly less confusing for all the people within a particular geographic area to continue to dial only 7 digits instead of 10. With the overlay method my home and cell phone could have two different area codes which doesn't seem very efficient to me. Thank you.	Residential
33	Sue Kay Moulton 980 118th St. Chippewa Falls WI 54729	Geographic Split	I believe in the long run a geographic split of the area code would be much easier for the greater majority of people to deal with than an overlay.	Residential
34	Sara Roth 29460 100th Ave Cadott WI 54717	Geographic Split	I would favor a geographic split of the 715 area code rather than an overlay situation.	Residential

Comments Received for the 715 Area Code

No.	CONTACT INFORMATION	SUPPORT SPLIT OR OVERLAY	COMMENT	Business or Residential
35	Willis Moulton 1030 Pine Needle Dr. Chippewa Falls WI 54729	Geographic Split	The geographic split of the area code seems much better than an overlay concept.	Residential
36	Terry Moulton 980 118th St Chippewa Falls WI 54729	Geographic Split	I would prefer a geographical split rather than an overlay.	Residential
37	Richard Thourne 3814 Claymore Lane Eau Claire WI 54701	Geographic Split	Support a geographical split in the 715 area centrally from North to South. This is not the first area code to have to undergo relief and it won't be the last. Business local government and residents need to adapt to the change and accept that it needs to happen. Going to 10 digit dialing is not preferred.	Residential
38	Dennis Dvoracek 211 Harvest Lane #2 Altoona WI 54720	Geographic Split	Why are you making such a big deal over this? There have been numerous other people in the country that have had area code changes. Somehow I'm sure they have lived through it. Only in the liberal community of Wisconsin have I heard such tremendous discussion over such a little thing. Just do it. I don't want to dial ten numbers and I don't want to have to remember that my neighbor's area code is different from mine. That is an absolute absurdity. JUST GET IT DONE AND STOP ALL THE MINDLESS DISCUSSION. Do you people have nothing else to do?	Residential
39	Naoni Bodway N51335 Oak Ridge Road Osseso WI 54758	Geographical Split	While neither solution is ideal I believe it would be very confusing to have an overlay situation with what I understand would be people in the same community having 2 different area codes which would seem on a completely random basis (as needed) as opposed to any criteria that you could easily understand or figure out. While there would be an initial extra expense to my business to make the change if my area is unlucky enough to be asked to make an area code change in the long run I think it would be the reasonable solution over time. If there is any data on how other areas have dealt with this situation I would be interested in hearing about that.	Residential
40	Jane Lokken 324 Hewitt Street Eau Claire WI 54703	Geographical Split	While more expensive to business in the short term I support a geographical split as easier to comprehend and work with over time. I am not in support of 10-digit dialing.	Residential
41	Angela Hite 4103 Liberty Court Eau Claire WI 54703	Overlay	PLEASE choose the overlay solution! Way to costly to business owner if you with the geographic split.	Residential
42	Jill Schilling Chippewa Falls WI 54729	Geographic Split	I would prefer a geographic split. People who would have to change their numbers will get over it. On the other hand having to dial the area code for every single local call would go on forever - and drive me crazy. An east/west split would be consistent with the current split in the southern half of the state.	Residential

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No.	CONTACT INFORMATION	SUPPORT SPLIT OR OVERLAY	COMMENT	Business or Residential
43	Lynn Embretson 2715 May Street Eau Claire WI 54701	Geographic Split	I would prefer and I believe others would agree a geographic split so we won't have to enter all 10 digits to call someone who is not long distance. Thank you for your consideration.	Residential
44	Susan McLeod Chippewa Valley Museum PO Box 1204 Eau Claire WI 54702	Overlay	It makes much more sense to add another number into the geographic area than to split the area in two and give one 715 and the other a new number. By adding another number into the same geographic area no one has to contend with the disruption/confusion of changing the number. Even though there is a great deal of publicity and automatic forwarding at the beginning of the change people keep numbers for years in address books etc. Eventually when they use the older number they can't get where they intended to go easily.	Residential
45	Bob McCoy 101 N. Farwell Eau Claire WI 54703	Overlay	I would like to see that each business is able to retain the 715 area code and not incur additional costs.	Business
46	Connie Fick 2802 Clark Place Eau Claire WI 54701	Overlay	I felt that the least impact would be an overlay system. Everyone has been informed of the change; however only new accounts would be adversely affected (along with/auto dialers have to change)	Residential
47	Marueite Taylor 203 S. Farewell Street Eau Claire WI 54701	Overlay	I would prefer that we be allowed to keep our current phone numbers even if it means dialing more numbers. There is a huge cost to employees to change letterheads business cards etc. In addition to the inconvenience to customers trying to find the new numbers. For Government agencies with strapped budgets already an added expense is a big problem.	Residential
48	James & Loretta Richman 821 Kinnickinnic Street Prescott WI 54021	Geographic Split	We feel the method that would cause the least confusion & be least costly to the public is to create a new geographic split. The Western part of the 715 area code is considered a part of the Twin Cities metropolitan area by the metropolitan officials who include it on maps of their metropolitan area. Most of the residents of this area do business with companies in the Twin Cities; work in the Twin Cities and seek health care shopping sports & cultural events in the Twin Cities area. This necessitates communication between the Twin Cities area & the Western Part of the 715 area code. Liaisons are already established with T.C. businesses & medical facilities. Our EMS system uses adjacent hospitals across the MN state line due to the closeness of advanced technology for critical injury cases. Our U.S. Mail is taken to the Twin Cities to be sorted & distributed for delivery. Many families have older parent/relatives living in the Twin Cities who require communication on a weekly sometimes daily basis. Local businesses rely on vendors from the Twin Cities for their supplies. A daily newspaper with a Wisconsin news section is delivered by Twin Cities newspaper carriers to area subscribers. Some parents carpool their school-age children to private schools in the Twin Cities just across the MN state line. This necessitates phone calls for numerous reasons between the families & the school. For these reasons we suggest a new geographical split with the western area of the 715 area code being retained.	Residential

Comments Received for the 715 Area Code

No.	CONTACT INFORMATION	SUPPORT SPLIT OR OVERLAY	COMMENT	Business or Residential
49	Dianna Johnston 234 N. Green Avenue New Richmond WI 54017	Overlay	I am of the opinion that overlay would be the best alternative. While having to dial all 10 digits can be somewhat of a hassle it is much less expensive as a business person to re-program auto dial numbers to include more digits than it is to have to inform all our customers and vendors nationwide and pay the expense of re-printing stationery business cards etc. not to mention the cost of manpower necessary to complete all these tasks. having overlay would be in this business person's and I expect most businesses best interests.	Business
50	Cathy Holt 1137 West Ives Street Marshfield WI 54449	Overlay	Thank you for the opportunity to write in support of the Overlay option. Our family has had our home phone number for almost 25 years. Over the years we have acquired six other phone numbers for cell phones fax and second land line. If we are forced to change our area code notification of businesses and people with whom we associate will entail an enormous amount of time and energy. Demand for phone numbers in increasing at a high rate. Changing our area code now does not guarantee that we will not have to do so again in the future. it would make more sense to create ne phone numbers for new users. having to dial an extra three digits is preferable to me than having to change my phone numbers. I urge implementation of the Overlay option.	Residential
51	Tina S. 450th St. Baldwin WI 54002	Geographic Split	While my first instinct was in favor of the overlay after reading more I have to vote for the split. May times I have to guess which area code is correct in the Twin Cities Metro area and I hate it. With a geographical split I have a better chances of getting the area code right as it is easier for me to go by band boundaries instead of trying to guess if people have "old" numbers of "new "numbers. No matter which option is chosen people are going to get irritated until they get used to it. Not all change is easy but it IS necessary. thanks for the chance to give my 2-cents worth.	Residential
52	Mary L Halada 410 S. Third Street River Falls WI 54022	Overlay	Thank you for the opportunity to comments. The university of Wisconsin - River Falls staff have reviewed the options and we'd be in favor of the overlay method. This would be much more convenient and less costly for the University. Thank you. If you have any questions please don't hesitate to contact me.	Business
53	Amanda Nissen 2459 113th Avenue Dresser WI 54009	Geographic Split	I would recommend splitting the 715 area code between the east and west area of the northwest region. Within that split the best option would seem to be to leave the 715 area code on the western side. This would allow those that do business with the MN metro area's to retain the number and not have to redistribute the information. While the eastern side would obviously argue against this I think that a lot less of announcements will need to be made if the western area keeps the area code. Please take these issues into consideration. Please do NOT do an overlay this would be very difficult and confusing of the whole area as oppose to only half the area having to change. Thank you!	Residential

Comments Received for the 715 Area Code

No.	CONTACT INFORMATION	SUPPORT SPLIT OR OVERLAY	COMMENT	Business or Residential
54	Karen Davidson 89745 Bark Point Rd Herbster WI 54844	Overlay	We would like to see the layover option chosen (current users keep 715). We have been through the geographic reassignment in Mps. It's time-consuming annoying and costly to notify everyone you know that your area code has changed. Because most people PROGRAM their phones today they select a NAME rather than dial 7 or 10 digits. Also with globalization the internet online banking and shopping speed dials caller ID and phone memories we are in turn 'recognized' by our phone number. Phone companies promise we can "keep your old number" if you switch to their service. They know the value of this option. Following the logic that geography divisions are helpful (for example knowing that downtown Mps/St. Paul is AC 612; East of 494 is 763; and WEST of 494 is 972) we would need to know the major rivers and freeways in towns all over the country. Please GO WITH THE LAYOVER. Assign new area codes to cell phones and then new land phones when it becomes necessary. This seems least disruptive to everyone. The geographic logic isn't as relevant as it used to be.	Residential
55	Sharon Stewart 810 Washington Avenue Washburn WI 54891	Geographic Split	My vote is for two area code regions. I have enough trouble remerging 7 digits: I don't want to have to remember 10! And I don't want my small community split into two are codes. Dialing 10 digits is too many. We have learned how to bear the costs of new stationary and signs from implementation of the 911 address system. With a six month grace period business owners can spread the cost out over several months.	Business
56	Neil Soltis Village Administrator 310 Chieftain St. Osceola WI 54020	Geographic Split	These comments are being submitted on behalf of the Board of the Village of Osceola. We are expressing our support for adopting a geographic split for the 715 area code that keeps the northwestern portion of Wisconsin in the 715 area code. The Village of Osceola is a border community and the bulk of its industrial and commercial base is tied to the Twin Cities. The change would have a far greater impact on the economic and cultural links than would be the case in other portions of the State. The Board feels strongly that maintaining the 715 area code in the Ares of northwest Wisconsin that benefit from the expansion of the Twin Cities metro area is in the economic best interest of the all residents of the State.	Business
57	Barbara Nelson 2568 County Road G Emerald WI 54013	Geographic Split	I would encourage the maintaining of the 715 prefix in northwest WI due to the rapid growth in the northwestern side and the proximity to the Twin Cities (MN). St. Croix and Pierce counties are considered part of the MN Metro area. Changing the prefix could have significant impact on individuals and businesses in the area. Overlay does not seem practical and it would be very confusing.	Residential
58	Jason Nilssen 980 Cedar Street Baldwin WI 54002	Geographic Split	I would just like to comment that I think it would be very confusing if we just gave the new phone numbers a different area code if they live in the same town. I think they should divide the current area code by a main highway or county and give 1 or the other a new area code and leave the other area with the 715 area code.	Residential
59	Patricia Zatopa 2789 High Peak Rd Rhineland WI 54501	Geographic Split	My home phone is within the area code 715. I was disappointed there are only 2 options being considered to resolve the issue either to split the area code into 2 or add an overlay. Why not change all the cell phone numbers to a different area code? that would not inconvenience or add financial burdens to homes and businesses. If that is not an option I would prefer the area be split into 2 area codes. dialing several numbers into each phone call one makes even when local is ridiculous. I'd appreciate a response to my questions and consideration of that option. Thanks for the opportunity to comment.	Residential

Comments Received for the 715 Area Code

No.	CONTACT INFORMATION	SUPPORT SPLIT OR OVERLAY	COMMENT	Business or Residential
60	Richard Wilson 11475 Cagle Rd. Arbor Vitae WI 54568	Geographic Split	I would prefer to see a split between the western and eastern halves of the current 715 area along the lines of alternate #3.	Residential
61	Sheri A. VandeRiet 943 W. Willow Street Louisville CO 80027	Overlay	I grew up in Rice Lake WI and have since moved to Colorado. A few years ago the Denver metro area faced the same situation as northern Wisconsin now faces. Previous solutions to the problem had been to add area codes to the existing 303 A.C.: first 970 for the northern part of the state then a few years later 719 for the southern portion of Colorado. All those citizens were required to change their area codes. When metro Denver again faced the prospect of running out of phone numbers an overlay solution was used with great success. New phone numbers were given the new area code of 720 while all existing phone numbers retained the 303 prefix. We were only required to dial all ten digits of a phone number no matter what the area code. 720 numbers are not long distance calls from a 303 prefix unless they are already in what would be a long distance area. It only took a short time for everyone to get used to his simple change and there are plenty of phone numbers to go around (even in the old 303 area). Denver area has a high percentage of cell-phone users and there are still enough phone numbers to go around. As a former resident of northern Wisconsin and based on personal experience with the area code overlay solution I would strongly recommend that PSC of Wisconsin take the overlay approach to adding an area code!	Residential
62	Marcella Braski N4233 W Knox Rd. Brantwood WI 54513	Overlay	Please leave the original 715 customers as is and any new customers can receive the new area code.	Residential
63	Vern R. Kenas N5825 CTH K Menomonie WI 54750	Overlay	I WOULD PREFER TO SEE AN OVERLAY SYSTEM WHEREIN EXISTING NUMBERS REMAIN THE SAME AND NEW NUMBERS USE THE NEW AREA CODE.	Residential
64	Mike Sanders 720 Kinnickinnic St. Hudson WI 54016	Geographic Split	I would like to see a geographical split of the 715 area code. This would allow another way to see what part of the state a business or person is just by looking at their phone number. When I look at phone numbers in Minnesota for instance I can tell what part of the state a contact is in just by the phone number. This is helpful when planning a day to visit contacts.	Residential
65	Rich Ruennele W11187 US Highway 10 Prescott WI 54021	Geographic Split	You should maintain the 715 area code for accounts in the west half of the dialing area due to their use by so many people and businesses from the Twin City metro area. A change would create massive economic hardship for more accounts that need business advertising professional contact and mutual representation to users in Minnesota. An overlay would create more confusion already felt by other users that have had to overlay local prefixes in towns like Hudson and River Falls.	Residential

Comments Received for the 715 Area Code

No.	CONTACT INFORMATION	SUPPORT SPLIT OR OVERLAY	COMMENT	Business or Residential
66	Dan Lesniak 816 Spring Road Mosinee WI 54455	Geographic Split	I am in full support of doing a split for the 715 area code. The overlay option would be too confusing considering the vast rural area of the 715 area. If the overlay option was taken it would be difficult as new numbers with the new area code get introduced...the general public would wonder "where in the world is '123" are code this isn't around here!" Also with "alternative #2" the most even split the division is pretty close to the general TV markets. The Eau Claire and southern Duluth/Superior markets would fit pretty close to the western area and the Wausau/Rhineland market is generally within the eastern area. (Note: There is only one of the other splits that is reasonable) As a lifelong "715"er and a local elected official I would have no opposition to a change in my area code. Even with the cost to businesses and individuals it would provide an opportunity to differentiate ourselves from the western part of the state. The various splits that have occurred with the 414 area code several years back have not created a vast array of problems so the 715 should not experience that with the split option. Again I am fully in favor of doing the SPLIT of the 715 area code. Bring on our new code! :)	Residential
67	John M Sweeney 4146 Camp Four Road Rhineland WI 54501	Geographic Split	I believe it would be best to distinguish an area for 715 and a new area code. The overlay of two area codes - in one geographic area would be confusing for the public.	Residential
68	Steve Roubinek N5040 Heart Lake Road Irma WI 54442	Geographic Split	Please go with a split. I understand 815 in Rockford was overlayed last year and they hate dialing the 11 digits. Best to change address labels Check etc. one time than the hassle of dialing 11 digits.	Residential
69	Patricia Draxler PO Box 2087 Baldwin WI 54002	Overlay	To Whom it may concern As the Executive Director of a non-profit organization I would like to encourage an overlay option versus a split of the current 715 area code. It would be a tremendous financial burden for our organization to support all the changes necessary if a split were the chosen option. I hope you fill take nonprofits and small businesses into consideration and the financial impact of this change on them as you make this decision. Thank you for your time and attention.	Business
70	John E. Larson 521 East Oak Street Glenwood City WI 54013	Geographic Split	I would much prefer a geographic split. THANK YOU	Residential
71	Karen Lyddon N5059 Wilderness Shore Irma WI 54442	Geographic Split	Hello.....The Irma address above is our vacation home; my husband and I will be moving there permanently next year. We currently live in Rockford IL and one year ago our 815 area code was overburdened and we now have an OVERLAY!!! UGH! The whole community and the legislators were asleep when this was not fought! It is a MAJOR pain to dial 1 + 815 on every local call! Those particularly affected by this are the elderly. To have to dial 11 numbers is very hard for them. The legislators now have their feet to the fire by the community to see if this can be reversed.....but it does not look good. I urge you to please NOT USE AN OVERLAY!! It will be a pain for those half of the people that have to change their area codes..however this pales in comparison to having all of the people dial 11 numbers ALL of the time.	Residential

Comments Received for the 715 Area Code

No.	CONTACT INFORMATION	SUPPORT SPLIT OR OVERLAY	COMMENT	Business or Residential
72	Crystal Malakar 122 1/2 Silver Street Apt 2 Hurley WI 54534	Overlay	In regards to the 715 area code situation I think that it would be beneficial to go with the overlay option where there'd eventually end up being two area codes for the same area and that we would have to dial 10 numbers (i.e. 1-715-561-5500). I agree with everyone who says this is beneficial because then business don't have to change stationary/etc. and that people don't really have to get rid of their old numbers. Most people when saying their phone number (especially cell phone users) might say the 715 as well as their number. It's not hard to remember that extra three digits whether it is the 715 or the overlay area code. Cell phone users often have to dial the area code in order to place a call anyways so this should affect them minimally. As long as people don't have to pay long distance to make calls to the new area code in their own city I don't see much of a problem with this option. I think that having to dial a few extra numbers is much more convenient than dividing the 715 area geographically. Doing so will cause problems for the business and individuals that have to change their numbers geographically. Besides when people get new phone lines they have to memorize a whole new number anyways so it shouldn't be a big deal when they get the new number and have to memorize the new overlay code as well. Thank you for allowing me the opportunity to share my opinion online as it is hard for me to make the actual public discussions.	Residential
73	Linda K. Wilson N5520 1090th St Prescott WI 54021	Geographic Split	I really feel as though it would be a lot less complicating if you were to geographically split the current 715 area code. The overlay options seems a thought it would be very confusing. I am not sure what the best division would be. I suppose it would have to be by population or county lines etc.	Residential
74	Jenny Behrmann 1021 Fay Lake Rd. Long Lake WI 54542	Overlay	I believe the overlay would be most cost effective alternative. As far as from a residential perspective an area code change would be inconvenient but from a business perspective it is more than that. Not only would all business cards letterheads literature and web sites have to be changed but the potential loss of business could also be very costly.	Residential
75	Stephanie Walczak 657 250th St Woodville WI 54028	Geographic Split	While I realize if the zip code area is split there will likely be much debate over where to draw the lines and which section will have to change their area code in the long run I truly believe this is the answer that makes the most sense. Coming from the Twin Cities Metro Area it was confusing enough knowing which suburbs were in which area code and trying to figure out which area code is right for wherever you are calling. If the overlay method is used everyone will have the confusion of not knowing which area code is going to be in effect unless they are always given the full phone number. If the split is used one can at least look up geographically which number is correct. Also while most people are probably using cell phones more and more not everyone is using them and not everyone is using them in all situations and it would be quite a hassle to always have to dial a 10-digit number when you may just be calling the business across the street.	Residential
76	Jacquelyn Wilson 207 N Metonga Avenue Crandon WI 54520	Geographic Split	Please go with a "Geographic Split" so when you calling someone you don't have to always try to figure out what area code to dial. It'll make it more confusing too when calling information to get someone's phone number if you don't with the split. thanks.	Residential

Comments Received for the 715 Area Code

No.	CONTACT INFORMATION	SUPPORT SPLIT OR OVERLAY	COMMENT	Business or Residential
77	Norm Osero 809 Melrose Place Amery WI 54001	Geographic Split	Using an overlay system seems to be the least disruptive to people and/or business. However I believe that split areas allow for easier identification as to where a business or person resides. Because an overlay system requires 10-digit dialing - people will be required to remember more numbers than with a split AC system. That said - I much prefer a split system over an overlay system.	Residential
78	Carol Lokken N11860 Country Rd Y Tomahawk WI 54487	Overlay	Keep 715 we already have to dial 715 plus on cell numbers so just always dial area code too	Residential
79	Walt Gander PO Box 1312 Eagle River WI 54521	Geographic Split	I support the creation of a new area code for a portion of the current 715 area I believe the hardship imposed by creating a new area code is one-time-only and is less of a hardship than requiring 10-digit dialing for all calls under the overlay option.	Residential
80	Dan Scholten 6611 Spider Lake Road Rhineland WI 54501	Overlay	I would prefer an overlay. Several years back we were assigned a new mailing address simply because they needed to renumber the road. We had not moved but we had to go to great effort to change our address with all of our business dealings family and friends. Even after over a half dozen years some people still get it wrong and try to send items to our old address. Kudos to the Post Office because they still forward first class stuff to us long after the forwarding order has expired. Will the phone company do this? I really doubt it. If fact if the area code is split one day you are one number and the next you are totally different. I know that there are no easy solutions but an overlay seems best.	Residential
81	Sara Scholten 6611 Spider Lake Road Rhineland WI 54501	Overlay	Several years ago our family had one phone number. Now with cell phones and computers our family has 6. this problem will just continue making another need for a split in the near future. I do not believe a split is the answer. Changing numbers can be done only at great cost to businesses. Many people would be very anxious about their number changing and it would seem almost paralyzing to some of our seniors. I would prefer an overlay. We can all get used to dialing a few extra numbers.	Residential
82	Gordon Lovsletten N8906 Belliveau Rd. Tomahawk WI 54487	Geographic Split	I feel that a split of the 715 area code would be the best solution. It would be less confusing considering that next door neighbors could have different area codes. Especially for those outside the area trying to locate someone. For someone to have to change their area code would not be that big a deal.	Residential
83	Mark Ravely 4715 Candlelite Lane Rhineland WI 54501	Overlay	Nobody likes changes but I believe the least inconvenience to everyone including our local businesses is to implement the "overlay system" and not change everyone's area code. I do not believe that dialing three more numbers to call someone is as much of a inconvenience vs. changing all of our other phone services including cell phones and computers.	Residential
84	Connie Kennedy 4447 Seminole Trail Green Bay WI 54313	Geographic Split	The area code relief should be handled with a geographic split. This is the way it was handled in the Chicago area and worked fine. The eastern portion of the 715 should remain the 715 with a split to give the western portion a new area code.	Residential
85	Dale Fischer PO Box 3004 Oshkosh WI 54903	Geographic Split	My Lord I can't imagine that an overlay would be implemented so that we would all have to dial our area code first even for local number. I am on the phone much of the day so please keep things as simple as you can re: this dialing procedure.	Residential

Comments Received for the 715 Area Code

No.	CONTACT INFORMATION	SUPPORT SPLIT OR OVERLAY	COMMENT	Business or Residential
86	Susan Pukall 11475 Cagle Rd. Arbor Vitae WI 54568	Geographic Split	I am opposed to the concept of an all-services overlay in the 715 area code. A geographic split would make much more sense. It would be terribly confusing for families and businesses within the same community to have different are codes and to have to dial all 10 digits every time you want to call someone within your own community. I understand it would be a temporary burden for people in the area that would change its area code to change letterhead and forms but it is easy enough to get stickers that say "Please note out new telephone number" and use those until the existing stock of stationary runs out. The area including the northern-most towns is less densely populated and has fewer businesses. Here's another idea - - why has no one proposed changing the area code for cellular users? To me that would be the best and easiest solution. Everybody would get to keep their home or business phone numbers and you would know when you were calling a mobile phone because the area code would be different.	Residential
87	Kathleen Demulling PO Box 115 Osceola WI 54020	Overlay	I would not like to see an area code change due to the fact we are located on the western side of the state and a change would affect some of the local numbers we have access to in Minnesota. When MN did the area code changes a few years back it was maddening to try to phone a 612 number and then have to redial using 651 which was on recording for a short time after the change then we had to guess. I would not like to have to dial 10 digits when I make local calls I run a business and the time element would prohibit a lot of calls I need to make during the coarse of a day. Please consider another options from the overlay.	Residential
88	Dan Roberts 636 E. Timber Drive Rhineland WI 54501	Geographic Split	I would prefer the area be split and a new area code be introduced to a section of the 715 territory. Dialing 7 numbers is more efficient that having to dial 10 all the time.	Residential
89	John Goldschmidt N9524 Four Lakes Rd Wausaukee WI 54177	Geographic Split	I strongly believe the PSC should implement the geographic split method to provide area code relief for the 715 area code.	Residential
90	Rena Worden N3076 State Highway 55 hite Lake WI 54491	Geographic Split	I live in White Lake WI (Antigo area Langlade county) and think that they should divide the 715 in half keeping the eastern part of the 715 area code as is.	Residential
91	David Hansen 13822 State HWY 32 & 64 Mountain WI 54149	Geographic Split	I would prefer that the area code for the eastern half of "715" remain as is. Alternative #2 is the one I prefer with "area B" keeping the 715 prefix. The closes meeting area for this for me was Marinette and I am retired living on a fixed income cost to travel there prohibitive. So it was only convenient to comment in this fashion. If you wish to contact me you may do so. I believe that this would cause a lot of retired people to be confused and their established communications would be in jeopardy. This are is full of retired people and this should be given a great deal of consideration when you make the decision.	Residential
92	Craig Nelson W8215 760th Avenue River Falls WI 54022	Geographic Split	I think you should just split the area code instead of doing an overlay. It would be the easiest solution with the least amount of confusion for everyone.	Residential

Comments Received for the 715 Area Code

No.	CONTACT INFORMATION	SUPPORT SPLIT OR OVERLAY	COMMENT	Business or Residential
93	Richard Giacalone 1601 E. 10th Street #204 Merrill WI 54452	Geographic Split	Regarding the area code relief for the 715 area code I favor a geographical split as I feel it would be easier to keep track of what area code you live in nor if you are trying to contact people in that area.	Residential
94	Todd Sackmann 2115 Meadow Brook Way Wausau WI 54403	Overlay	I support the overlay option for the 715 area code relief. 1) with increased cellular phone usage and lengthy contracts any time people carry these alternate area codes to new territories so there is already increasing experience with this overlay happening. 2) Databases are now a lot more than just the local phone book. There are exponentially more locations that would need to have records revised for area code changes. I believe the frustration with having electronic resources pointing individuals to outdated phone numbers will be more inconvenient than having two area codes in the same building (we already have two different prefixes in our building so how much more of a challenge would be area codes?).	Residential
95	Karen Cichucki 1860 Kowalski Road Mosinee WI 54455	Geographic Split	It makes more sense to split the area.	Residential
96	Ronald A. Rosenberg 1815 Fenwick Avenue Eau Claire WI 54701	Geographic Split	For many years I lived in Palm Springs California and owned a business in Los Angeles. At both locations there were area code issues similar to the one involving 715. Much time and energy were consumed by those who anticipated "gloom and doom" with the changes that would follow either an overlay or a split. My business and the businesses of my customers were NOT damaged by the change from 213 to 323 even though many griped about the expenses of needing new business stationary and other promotional papers. In Palm Springs the change from 619 to 760 was greeted by similar hysteria. No one to my knowledge lost anything more than sleep over the issue. From my experiences I favor the split in the 715 area code. Everyone (And I use the word everyone carefully.) will survive with a little more than an overdose of media hype.	Residential
97	Chris Bates 321 Drier Street Durand WI 54736	Geographic Split	I would like to see a 715 split splitting west and east keeping 715 to the west.	Residential
98	Jane Koszarek W10282 Monarch Rd Antigo WI 54409	Geographic Split	I think that the area should be split and a new area code be assigned. That will be less confusing than having new customers with one area code number and everyone else with the 715. Just split it and be done with it.	Residential
99	Melody Drexler 75338 Lang-Nash Rd White Lake WI 54491	Geographic Split	I believe that an overlay would cause a lot of confusion. One house would be one area code and would require dialing 10 digits. Every new number would be that way. A split in the area would be less confusing. People would get used to it and the neighborhoods would not be mixed up.	Residential
100	Diane Walters 2501 River Bend Rd. Plover WI 54467	Geographic Split	I would like to see the geographic plan go into effect. Take into consideration the demographics (population) of each area after split & give the new area code to the area with the least number of people (or phone numbers). Do as all other states have done and do the geographic split. My in-laws live in Florida & have gone through 2 splits and they wouldn't have it any other way. We don't want to have to dial 10 numbers. what a pain!. thanks.	Residential

Comments Received for the 715 Area Code

No.	CONTACT INFORMATION	SUPPORT SPLIT OR OVERLAY	COMMENT	Business or Residential
101	Francis Walter 3211 Franklin Street #101 Wisconsin Rapids WI 54494	Wireless Overlay	Why can't all cell phone users be given a new area code and leave the rest alone. We were fine before the cell phone business started. Thank You.	Residential
102	John M Coughlin 755 140th Avenue New Richmond WI 54017	Overlay	The western side of the region is growing fastest due to the Twin Cities. We should retain our area code. The best solution is to do an overlay with new customers getting the new area code. Small nonprofit groups and other businesses should not have to bear the cost just because more people are moving here and getting phones.	Residential
103	Linda Sturtevant 104 Park Avenue Woodville WI 54028	Overlay	We would support an overlay. We are a small business that would be greatly affected in cost and losing contact with customers - by a change to area code already printed on cards and brochures and documents. I am quite familiar with the hassles created when the Minneapolis/St. Paul communities had to split. It is a nightmare in expense for all involved to change phone numbers and for those trying to contact the new area codes it is also very difficult if communication about who is at what area code isn't relayed to all parties. If anything - going forward I think cell phones should have to get their own area codes - versus land lines. They are one of the main reasons (besides overall growth in Western Wisconsin) that numbers are being consumed. It just doesn't matter anymore if a cell phone is 715-651- or 612. thanks for your consideration.	Business
104	Veronica Standeven 211 N. 5th Avenue Abbotsford WI 54405	Geographic Split	I also have a residence in Eau Claire at 2821 Morningside Drive Eau Claire WI 54703. I split my time between the two residences. I favor a split instead of an overlay.	Residential
105	Julie Hove 1082 Country Rd N Roberts WI 54023	Geographic Split	I would like to see a geographic split it seem much easier and cleaner than doing the overlay.	Residential
106	Emily Matchey N46052 County Road D Strum WI 54770	Geographic Split	I prefer a split to an overlay.	Residential
107	Weston Arndt 700 Hillcrest Street Baldwin WI 54002	Overlay	As both a resident and employee in the 715 area code region I am a strong supporter of the overlay plan. As I see it the only negative is dialing extra digits for local calls. With the speed dial technology this is easily remedied. I see a lot more hassle in getting a new number and changing phone directories business cards and informing customers clients friends and family of the number change. 100% Overlay no question. Thank you for reviewing my comments.	Residential

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No.	CONTACT INFORMATION	SUPPORT SPLIT OR OVERLAY	COMMENT	Business or Residential
108	Charles Hagg 3209 Garner St Eau Claire WI 54701	Geographic Split	I favor the area code split even if my half of the old 715 is the one to get a new number. If we go with the split five years from now long after new cards and letterhead is printed (or stamped) and we have informed our friends and relatives it for the most part won't make any difference. With the overlay we will still be entering ten numbers ten years from now. Not only that the map will no longer tell us what someones code is.	Residential
109	Connie Good N5943 Deertail Trl Glen Flora WI 54526	Geographic Split	Geographical split is the cleanest most definitive change. That way there is no question as to what area an individual is in. For instance with the Milwaukee change you have to dial 414 first and if that doesn't work dial 920 and visa versus very frustrating and time consuming. Businesses that have to change can easily get the word out to their customer base through email mass mailings inserts in their billings/statements etc.	Residential
110	Harry A. Beck 2833 50th Ave Osceola WI 54020	Geographic Split	I would prefer a split in order to keep all in a given geographic area in the same area code. I think it would be easier to make a one time change in your area code (if you're in the new zone) than having to dial 10 digits for all phone calls. That you for soliciting input.	Residential
111	Michael Korf 1421 Hanley Rd Hudson WI 54016	Overlay	As a small business person the overlay would work better for me because I would guarantee that I keep my numbers and my international customers with parts issues would be able to contact us easily. Our customers are primarily commercial accounts and therefore time is usually of the essence to get them back in business. A fact about our customers is that they often do not contact us for 18 to 24+ most because of our product life so any recorded number change notification would not help them get the right number. Because of the number of customers we have to notify them by mail or even phone would have significant impact on our bottom line. If we remained in the 715 area code either the split or the overlay would work for us.	Business
112	Don Richards 123 E. Elm Street River Falls WI 54022	Geographic Split	I would prefer that a geographical split option be used with the western half of the district retaining the same prefix.	Residential
113	Wendy Sander 2672 60th Avenue Woodville WI 54028	Geographic Split	I believe a split for the 715 area code is preferable to an overlay. With an overlay we would have to dial 11 numbers to call a neighbor--which would be very cumbersome. I would request that the far western Wisconsin area maintain the 715 number.	Residential
114	Ronald King 1331 101st Street Amery WI 54001	Geographic Split	As a senior citizen I would prefer that the 715 area code have a geographic split rather than the overlay which would require me to dial ten numbers. Those of us who are older have enough trouble trying to remember seven digits.	Residential
115	Linda Burkart 1234 Red Maple Ridge Eau Claire WI 54703	Geographic Split	I am opposed to the "overlay" solution. While no one wants to change it doesn't make sense to make all of use "change" by dialing 10 digits. I am unaware of any place where this system was implemented. I know the 414 area code was split and is now 414 and 920. I also know that the Minneapolis-St. Paul has at least two area codes. A consistent solution to the problem is the best way to handle it. Don't try to correct the problem by making everyone happy, that just results in no one being satisfied.	Residential

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No.	CONTACT INFORMATION	SUPPORT SPLIT OR OVERLAY	COMMENT	Business or Residential
116	James Dimmers 125 - Depot Rd. Box 366 Osceola WI 54020	Overlay	The inconvenience of having one's area code changed can be extensive and expensive for the person. We have to change our business forms and cards mailing lists that we are on alert so many companies and persons it takes a load of time that many of us just don't have. therefore if we must accept the change at least do it as the grid which adds this new area code only to new phone numbers and we get to keep the present area code and number. Thank for the opportunity to comment on this issue.	Business
117	Judith Barisonzi 324 E. Sawyer St. Rice Lake WI 54868	Geographic Split	Since none of the scheduled meetings are near my home I am filing a comments electronically. I believe it is preferable to divide area code 715 rather than to add 3 more digits for everyone. True some of us will be inconvenienced for a while sine we have to inform everyone of the new number and (if we are a business) print new cards stationary etc. But that is better than everyone being inconvenienced permanently by having to do the above plus punch in a along string of numbers even just to make a local call forever. It is hard enough to remember and punch in eleven numbers as it is--making it fourteen would make the task unmanageable especially for the elderly. thank you for taking me comments into consideration.	Residential
118	Reid Wronski 1538 Foster Ct. River Falls WI 54022	Geographic Split	New area codes should be established by geographical areas rather than overlays. This seem to be a more common practice in this part of the country and makes more sense in the end.	Residential
119	Bob Schmidt 6188 Austin Lake Rd. Webster WI 54893	Geographic Split	Having gone through and living with an Overlay system as was done in northern IL several years ago makes me now plead with you to use the Geographical Split method.	Residential
120	Rena Rogers 310 Chieftain Street Osceola WI 54020	Geographic Split	I am writing to express support for a geographic split in the 715 area code area. Initially this change may costs businesses additional monies (changing business cards letter head etc) but in the long run it will save both individuals and businesses time (and therefore money) spent in continually dialing 10 digits. The geographic split is very logical and easy to use.	Residential
121	Janet Nelson W3665 Rim Rock Rd. Eau Claire WI 54701	Overlay	I feel that the overlay would be the least costly to most citizens. With a lot of people using cell phones today much of the time we are dialing 10 digits anyway so it's not that inconvenient to press 3 more numbers.	Residential
122	Kim Droege 1001 Ludlow Avenue Cameron WI 54822	Geographic Split	I believe a split would b easiest to digest. An overlay means everyone dials 10 digits with every call which sounds like a pain. On cell phones it likely won't be a big deal but those of us who use a landline (and that's lots of older folks) it'll be a big deal. How about splitting the whole idea into thirds? leave the 715 in the West 920 in the East and then give the middle a new area code.	Residential
123	Rebecca Albrecht 3340 Sanford Lane Eau Claire WI 54703	No Preference Disclosed	I could honestly care less if my are code is to change. Just hopefully I will find out before hand so I can tell people	Residential

Comments Received for the 715 Area Code

No.	CONTACT INFORMATION	SUPPORT SPLIT OR OVERLAY	COMMENT	Business or Residential
124	Adam Bauer 224 E. Brown St. Augusta WI 54722	Geographic Split	My feeling is that a split rather than a overlay would be a better option than the overlay. In the job I have now I service equipment in about a 100 mile radius which means that I contact a lot of people. Now it is easy everyone north is 715 and everyone south is 608. I definitely think it is easier to remember the area code by the geographic region rather than trying to remember if the person I need to contact across town is 715 or something else. I understand the up front it would be more headache to do a split but in the long run I feel that it is the better option.	Residential
125	Bret Hatzel W2610 Mitchell Road Eau Claire WI 54701	Overlay	I believe that all new numbers should be given the new area code. Why change numbers that already exist?	Residential
126	Robert Kriewaldt 310 E State St. Iola WI 54945	Overlay	In order to relieve the pending shortage of phone numbers in the 715 & 920 areas codes I would strongly recommend that the PSC approve the overlay method of creating new area codes as opposed to splitting the existing areas. The following are some of the reasons why I believe overlay is the best option. 1. Many people and businesses have their phone numbers being used by others all over the country. To contact all of those using our phone numbers especially those using them only sporadically will be very difficult. 2. The cost of printing new stationary business cards etc. If ones are code is changed can be expensive. 3. Living on the edge of the 715 and 920 area codes creates many frustrations in trying to make calls. Sometimes we need to only dial seven digits even when the number is in another area code and at the same time we often have to dial our area code for calls within our area code. If we have to always dial the 10 digit number much of this confusion would go away. 4. Those who use cell phones are already in the habit of dialing 10 digits so doing so far those rare calls we make on land lines would make things easier as it would bring consistency to how we dial our cell phones and land lines.	Residential
127	Lorraine Goodlad 2022 10th Avenue Star Prairie WI 54026	Wireless Overlay	If all cell phones were to use a new area code it would leave room for more land phones to be added in the 715 area for several more years. Please consider this option as I believe that changing area codes for the present land phone would present considerably more of a problem for users than requiring cell phones to make the change.	Residential
128	Ruth Sproull 1780 Larsen Dr. Rhineland WI 54501	Overlay	I vote for an overlay in the area code of 715. Because there is much communications between the adjoining towns in the area we are often using 10-digit dialing anyway to reach friends businesses and colleagues. Also this would keep existing numbers the same which would inconvenience the least those using the 715 area code. With only new numbers being given the new area code they could start and stay with the number they are given.	Residential

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No.	CONTACT INFORMATION	SUPPORT SPLIT OR OVERLAY	COMMENT	Business or Residential
129	Robert Giese W4946 State Highway 86 Ogema WI 54459	Overlay	I believe the best option for the 715 area code district is to create an overlay district. I write this having experienced both methods while living in the northwest suburban Chicago area. Two times we changed are codes while I lived there - from 312 to 708 to 847. Both times were disruptive requiring redoing letterheads cards directory listings etc. This was a nuisance and an added personal and business expense. The third time another area code was overlaid the 847 district (233 I believe). this was much more convenient with no expenses of changing m personal or business numbers or having those trying to call me confused. The only "inconvenience" was to have always dial the area code. But quite frankly with phone memory dialing this is not really a problem after the first time you dial a number. Besides where I live in rural area I'm often having to dial twice because I choose wrong on whether or not I have to dial the area code for a particular number or not. It would be easier to just always dial it.	Residential
130	Beth Huizenga W2805 Shady Lane Pewaukee WI 53072	Wireless overlay	My husband and I own land in northern WI (in the 715 area code area). Having recently changed area codes for our main home from 414 to 262 I know the amount of time and energy involved in this change. And years after the change we frequently need to give out our area code to someone we are communicating with if we are expecting a return call even though calls to the 414 area code are not long distance for us nor is our phone number a long distance call for the majority of the 414 area code. I have always wondered that instead of making new are codes if it wouldn't just make more since to add a * or # to numbers that are cell phones or faxes to delineate that number from a "regular" phone number and then these numbers could be reused. It would make things a whole lot easier for people if a business phone number and fax number were the same except for the designated sign. This would still work in large businesses where the fax numbers could be the same as the phone number for their various departments. Since phone companies already use things such as #69 etc. for various things so I doubt if it would take too much retooling to make this happen. Food for thought.	Residential
131	Randall Stansbury 14991 288th Aven New Auburn WI 54757	Geographic Split	A geographical split makes sense an overlay does not. Its not just the inconvenience of dialing a 10 digit number to call your neighbor or someone close that is in your immediate community. It also causes confusion and frustration when trying to remember a phone number or notes that you've made of someone's phone number. I hope common sense wins out in this decision.	Residential
132	Terri Bahe 74265 Ondossagon Rd Washburn WI 54891	Geographic Split	I feel you should do a geographic split. Paper changes and remembering one new exchange would only be a temporary cost and inconvenience. Most places change forms regularly. Having to dial 10 numbers would be lifelong and confusing to remember numbers (a safety issue especially for young children). The technology overload is stressful enough without making phone calls more difficult. Please do not do an overlay system up here. Please do not give my name and address to others.	Residential
133	Sue Nieau N6706 57th St. Beldenville WI 54003	Wireless Overlay	I'm against a geographical split. If you're going to add area codes why not start with cell phones. Cell phones are a luxury to most people including me. I think they should be put on their own area code. How are next-door neighbors supposed to keep in track of the fact that the neighbor on the right is one area code while the neighbor on the left is another. Doesn't make much since. Besides then cell phone would be more easily recognized by their area. First change the cell phones if more changes are needed after that then change the area code by counties or whole towns but not by old and new numbers.	Residential

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No.	CONTACT INFORMATION	SUPPORT SPLIT OR OVERLAY	COMMENT	Business or Residential
134	Julie Gunther 898 Highlander Trail Hudson WI 54016	Overlay	Please use the overlay method. This would be the most fair as no one would have to change their phone number (which can be expensive and annoying for both businesses and the public) A geographic split will cause hard feelings for at least 1/2 the state.	Residential
135	David Smith 120 W Lazy Acres Rd Wausau WI 54401	Geographic Split	To my option for the area code 715 my option is to split with the new area code instead overlap.	Residential
136	Tom Gabert 11804 Franklin Lake Rd. Minocqua WI 54548	No Preference Disclosed	A simple expansion of phone lines will not improve service in this rural area. Cell phone carriers are not compelled to complete their signal coverage area. Lane line providers are not compelled to offer DSL or other high speed internet access. Therefore many citizens have multiple lines to fill the gaps that are created. Interestingly the service providers profit by their inadequate service since each additional line creates charges that we have to pay. Consider how many business and homes could decrease the number of lines (phone data fax cell) with broadband coverage. I am the treasurer of the Lakeland Union High School in Minocqua we spent hundreds of thousands of taxpayer's dollars to create a educational environment that mirrors 21st century technology. Sadly the local phone provider will not invest in service to maximize this resource for students and parents at home in many townships. I would ask the PSC to determine the number of homes that lack access to high speed internet access and link expansion of that service to "relief" of 715 congestion. Solving the inequity of access is an important goal to improve rural education and business growth	Residential
137	Mary Raith 303 Sutiff Avenue Rhineland WI 54501	Geographic Split	I am NOT in favor of an overlay. A geographic split will naturally create confusion and inconvenience but people will eventually become accustomed to it and will automatically associate specific areas with a specific area code. With an overlay the confusion and inconvenience will go on forever. it's also absurd to have to dial 10 digits every time you make a local call. I also believe there's a lot of merit to some of the other comments that questions whether or not one additional area code is sufficient. If we're going to create mass confusion and inconvenience why not split it at least 3 ways now and get it over with instead of having to go through this all over again in 10 or 15 years.	Residential
138	Leah Peterson 1897 Deerwood Trail Mosinee WI 54455	Geographic Split	I would prefer a geographic split. Much easier than dialing a 10 digit number especially for children.	Residential
139	Steve Weis 1003 Winton Street Wausau WI 54403	Geographic Split	My preference would be to do a geographical split instead of the Overlay. The geographical split will allow everyone in the same area (community) to have the same area code and reduce dialing confusion that would occur with the overlay plan. I would like to propose another alternative plan. Instead of dividing the area in 2 it should be split in 3 areas. The first split would be Highway 8. the area to the north of Highway 8 would be one area. the area to the south of Highway 8 should then be split along highway 13. this would put each of the three major cities currently in the 715 area code in its own area. (Superior-North Eau Claire-Southwest and Wausau - Southeast). This will allows for greater life expectancy of each area.	Residential

Comments Received for the 715 Area Code

No.	CONTACT INFORMATION	SUPPORT SPLIT OR OVERLAY	COMMENT	Business or Residential
140	Mark Kenney 1746 95th Street New Richmond WI 54017	Geographic Split	First I take issue with the matter of requiring an additional area code for the 715 area. Competition among carriers is non-existent and the allocation of 10,000 numbers to a carrier is a poor practice of number management that has not been addressed by the PSC. In the matter of the 715 area code relief questions the best option is to enact an area code split on a East-West plane following a similar geographic arrangement as when 715 and 414 were implemented in 1947. The east west line should be run following US highway 8 as an easily identifiable geographic boundary separating the northern and southern halves. After determining the geographic split the area while will keep 715 as the area code must be the one containing the majority of existing numbers. The split must be geographically based and not at the convenience of the telephone company central office where an exchange may be located. An overlay option would not be warranted since there area relatively no large population centers warranting relief and thusly a distributed overlay would only add confusion. Additionally a prefix solely for cell phones is not warranted due to the small size of local calling areas within the region. Mandatory 10 digit dialing is not desirable for those that are accustomed to 7 digit dialing.	Residential
141	Margaret Siebenaler 1356 Main Street Houlton WI 54082	No Preference Disclosed	We have lived in the areas since 1968 we moved here from St. Paul MN when we had our phone connected the area code was 715 as it is yet today. The problem was we were listed in the Hudson section of the phone book because our address at that time was Hudson. our house was the last one for mail being delivered from Hudson. Houlton mail came from the Stillwater post office. So we had a Houlton phone number with a Hudson address very confusing for everyone. Please don't make us go thru hoops to keep 715.	Residential
142	Gayle S. Stangle N14633 County Road B Park Falls WI 54552	Overlay	RE. the introduction of another area code in addition to 715 in northern WI: I am in favor of the overlay method. It is my opinion that it will be considerably less confusing for those of us with longstanding accounts/phone numbers. People and businesses would be better able to readily adjust to a new area code. Using the overlay method would also save small businesses the dreadful expense of printing costs etc. Thank you for considering my opinion.	Residential

Comments Received for the 715 Area Code

No.	CONTACT INFORMATION	SUPPORT SPLIT OR OVERLAY	COMMENT	Business or Residential
143	Dustin Doornink W318 N 2nd Street Spring Valley WI 54767	Geographic Split	<p>At home we have 1 land line 715 number and two 715 cell phone numbers. I don't know the population of the Wausau Stevens Point WI Rapids area but I know the I-94 corridor is growing rapidly and I wonder if splitting 715 into 2 area codes is going to last past 2015. We should be long range planning here that may mean the I-94 corridor all the way to Chippewa having an area code the Central WI area having a code and then very northern area having a code. I don't have the numbers to support this but this would a long range plan. I am NOT in favor of overlay as this will confuse many people and just doesn't seem right. If a new neighbor moved in next door and they had a different area code I would have to find this out just to call them. I would rather have a new area code than have to remember 10 digits compared to 4 or 7. Now for the business point of view. I am the Director of Technology for a company that has 100+ homes through out the northern 2/3 of Wisconsin. We also have 13 offices throughout that area too. They are in : Black River Falls Eau Claire two in Menomonie River Falls New Richmond Siren Spooner Rice Lake Owen Schofield Plover and Ladysmith. From a business standpoint we would have cost to change our advertising stationary etc. for a split but I still feel better it is better than an overlay as if we get new lines they will be in a different area code and we would have to change the programming on our phone system to dial 10 digits. It makes more sense to split as it will cost money to do it either way. A split is cleaner as you know what area code a region is. Obviously I feel 715 should stay in the I-94 corridor as it is more established with MN people. With that being said I remember when the Twin Cities split their area codes they used to have just one (612) then they split to 651 near the WI border. They was a lot of complaining but now everything is fine. Then they split again (not long range planning whey they split the first time) to (952763). Again lots of complaining but it is working fine now and no one complains. Everyone will complain either way when it happens but with a split it is clean and people won't complain when they are used to it. With an overlay I would think complaining would continue longer as it is more confusing.</p>	Residential
144	Mary Javner 540 11th St. Prairie Farm WI 54762	Geographic Split	<p>Re: the debate on 715 area code relief. As a citizen residing in the 715 area code and an employee of a rural phone company in northwest Wisconsin I feel that an area code split is the better option. I work in our Customer Service Dept. and I see an overlay plan as being confusing to an area especially for our elderly population. I realize that one whole area would have to get used to a new area code but to me that's less confusing than having your new neighbor have an entirely different area code. It would also be inconvenient for companies adding new phone lines and customers who may want a separate line for data and fax having to have an entirely different area code in the same building or house. And keep in mind the confusion this would cause the customer calling a local business with two local codes in the same building including or published numbers with different area codes. And as much as I'd like to be in the area keeping the 715 area code I'd be willing to change to a new one if the entire area was changing also. Unlike Senator Scott Suder I don't feel that anyone has a "right" to the 715 area code. He said his constituents would be inconvenienced by a split. Doesn't he realize that they'd also be inconvenienced by two different area codes in the same building including all of the county offices and businesses in his district? His comments regarding this makes it sounds like the overlay plan wouldn't inconvenience anyone when in my opinion it would be a larger inconvenience to them. I believe that both Senators Harsdorf and Kreitlow have the right idea in saying that we'll adapt to the change of a split. Thank you for allowing me to voice my opinion in this matter.</p>	Residential

Comments Received for the 715 Area Code

No.	CONTACT INFORMATION	SUPPORT SPLIT OR OVERLAY	COMMENT	Business or Residential
145	James & Kathy Miller 77270 Church Corner Road Washburn WI 54891	Overlay	We support the "overlay" plan for introduction of a new area code within the current 715 area. This will cause the least disruption and yet accommodate growth.	Residential
146	Gordon J. Conard 36 Eagles Nest Circle Hudson WI 54016	Geographic Split	Re: Area Code Relief for the 715 Area Code. It is my understanding that the options being proposed area an overlay or geographical split. I propose a geographical split and that western Wisconsin should keep the 715 area code in a geographic split for two reasons. First our proximity to the Twin Cities means that a change would not only affect western Wisconsin but also the million of people and businesses in the Twin Cities. There is a substantial economic link between the Twin Cities and western Wisconsin unique to our part of the state. Secondly the comparative growth in our region would likely lead to another split in 19 years as opposed to 24 years in the eastern part. therefore we would be inconvenienced more often if we were forced to have a new area code. Please consider these comments in the decision making process.	Residential
147	Lori Dehlinger Portage County Business Council 5501 Vern Homes Drive Stevens Point WI 54481	Geographic Split	On behalf of the Portage County Business Council I am writing in response to the Public Service Commission's (PSC) Proposed changes to the existing 715 area code. The Portage County Business Council represents nearly 600 members and would like to express our strong preference for a geographic split alternative that retains the 715 area code for Portage County. Portage County has a number of large businesses including Sentry Insurance Land's End Delta Dental Associated Bank AIG Ministry Health Care as well as the University of Wisconsin-Stevens Point and Stevens Point Public Schools. These businesses (several with call centers) and educational facilities would incur great expense if forced to change their area codes. This in turn would have a negative impact on the communities and residents of Portage County. Again Portage County Business Council requests that the Commission recommend and implement a geographical split that retains the 715 area code for Portage County. We appreciate the Commission's consideration.	Business
148	Land's End Portage County	Geographic Split	See PSC REF# 85624	Business
149	Delta Dental Portage County	Geographic Split	See PSC REF# 85624	Business
150	Associated Bank Portage County	Geographic Split	See PSC REF# 85624	Business
151	AIG Portage County	Geographic Split	See PSC REF# 85624	Business
152	Ministry Health Care Portage County	Geographic Split	See PSC REF# 85624	Business

Comments Received for the 715 Area Code

No.	CONTACT INFORMATION	SUPPORT SPLIT OR OVERLAY	COMMENT	Business or Residential
153	University of Wisconsin - Stevens Point Portage County	Geographic Split	See PSC REF# 85624	Business
154	Stevens Point Public Schools Portage County	Geographic Split	See PSC REF# 85624	Business
155	Roger Breske State Senator State Capital South Wing PO Box 7882 Madison WI 53707-7854	Overlay	I am writing regarding the proposed relief alternatives for the 715 area code. Due to the fact that there is a finite supply of telephone numbers with the 715 prefix I understand that change is necessary. However any course of action chosen by the Public Service Commission will obviously have long term consequences for the people and businesses of the Northwoods. With these consideration in mind I would like to offer my strong support to keep the Northwoods within the 715 area code. Further I would ask the Commission to consider granting new area codes to all cellular phones and keeping the current land line phone numbers the same. I appreciate the fact that the affected public had an opportunity to attend meetings and express their opinions on the changes. In meeting with the PSC representatives in Niagara it was clear that the local telephone company supports a change to cell phone subscribers area codes thereby releasing many of the newly assigned numbers. As cell phones by their nature are mobile locations to me it's a no-brainer decision to reassign those customers a new area code. As all of you know a number of large businesses are located in the Northwoods including Marshfield Clinics Sentry Insurance Harley Davidson Stora Enso Packaging Corporation of America (PCA) as well as many tourist attractions and the hospitality industry which are the lifeblood of our economy. Businesses forced to change their area codes will obviously incur a number of large expenses which in turn could have a number of negative consequences on communities as a whole. A change in area code would also force the towns and cities in my district to incur additional expenses. In addition to local businesses and governments a number of residents in our districts have had the 715 prefix for many years. An area code change would undoubtedly cause them undue hardship. Lastly and perhaps most importantly Northern Wisconsin is home to a high concentration of senior citizens and low-income residents. An area code change could potentially cause a great deal of confusion for these residents. Thank you very much for your time and attention to this matter. If you have any questions or should you require any additional information please do not hesitate to contact me.	Legislature
156	Wisconsin Legislature PO Box 8952 Madison WI 53708	Geographic Split	See PSC REF# 84734 - ! Letter for	Legislature
157	Carol Forseth 440 Fraser Drive Amherst WI	Overlay	I am a land line 715 phone user and a 920 cell phone user. My comment is <u>NOT</u> to split these codes by geographic region. My preference is to assign <u>NEW CODES to NEW USERS</u> .	Residential
158	Madlyn Brown 800 Bowling LN Waupaca WI 54981	Overlay	I think it is only fair for the people that now have area code #715 to keep the same area code. Likewise I think it is only fair for the new people to get a new area code.	Residential

Comments Received for the 715 Area Code

No.	CONTACT INFORMATION	SUPPORT SPLIT OR OVERLAY	COMMENT	Business or Residential
159	Marty & Ken Turner Marinette	Geographic Split	I am writing to strongly urge the PSC to split the 715 area code! In the long run this will be less confusing than overlaying. Here two neighbors have different area codes even 2 people in the same household could have different area codes. In splitting it seems that the northern end should not split Vilas County but should go more directly north up HWY 51 instead of cutting east. To me it doesn't matter which gets the new area code but according to the map in our paper the first half has 18 years before running out of numbers so maybe that side should retain 715. Otherwise I don't care if we have to switch to a new area code if there is a good reason for our half changing. Split not overlay.	Residential
160	John and Jan Voller 612 Wisconsin Street Waupaca WI 54981	Overlay	I am writing in regards to case No. 5-TN-100 We would prefer to have the overlay option.	Residential
161	Tanis Regner 1100 Jeffrey Blvd Cumberland WI 54829	Geographic Split	I support leaving area code 715 for northwestern Wisconsin. I realize you must add new area code numbers and I would not mind if I was in "the split". I just don't want overlay codes. Designate one area code for "here" and a new area code for "there". There term is "area code" not "overlay code". I have lived in several parts of the country where area codes have been changed due to the large demand for telephone numbers. So what if people need to reprint business cards etc. This is common across the nation.	Residential
162	Robert Dickerson 3 52 Granite St Waupaca WI 54981	Geographic Split	It seems to me that an overlay area code system would be difficult for the young kids just starting to learn the important phone numbers is their lives. It would also be confusing and irritating for old folks like myself. And for everyone else it would mean the end of memorizing more than just a few phone numbers. There are many more reasons why I am against the overlay system but I am sure you have already heard them. so I will just say I vote for the split system.	Residential
163	Kelly Klingbeil 912 Pearl Street Apt 209 Chippewa falls WI 54729	Overlay	I have learned about the intended area code problem that Northern and West Central Wisconsin will be facing when the PSC will run out of telephone numbers in the year 2009. I currently have a (715) area code and I think it would cause a lot of problems trying to notify all of my friends and relatives if my area would be given a different area code. It would not be so bad if there would be a message in the telephone system notifying callers about the change. So if you change some people's area codes please keep that in mind. However I believe the "overlay" system would be much easier especially for people who currently have (715) area codes. that way current telephone number holders would not need to change anything when the change happens. I do not know what else to say to support the "overlay" system except that it would be easier. So please consider my "voice" and "vote". It is not very fun changing what is already in place. Businesses would need to change their advertisements their business cards and probably numerous other things. Good luck trying to make the most efficient and practical change.	Residential

Comments Received for the 715 Area Code

No.	CONTACT INFORMATION	SUPPORT SPLIT OR OVERLAY	COMMENT	Business or Residential
164	Vicki Iverson 5084 159th Street Chippewa Falls WI 54729	Geographic Split	I would recommend a split-area for the 715 area code instead of the overlay system. This would eliminate having to dial 10 numbers with every local phone call. Programmed numbers will work for your friends and family but businesses make a lot of phone calls to their customers and they don't have those numbers programmed in speed dial. Since Eau Claire Chippewa Falls Wausau and Menomoneie are the larger cities in the 715 area code it would be more convenient and cost effective if these cities could continue to use the 715 area code. Since these larger cities have the majority of businesses it would be more efficient if they didn't have to change their computer data base and printed materials which support and advertise their businesses. If adding another area code will only last an additional 22 years before those numbers run out maybe we should consider adding 2 more area codes now so we won't have to go through this again in 22 years.	Residential
165	Lake Wissota Animal Hospital Doris Durst Robert Mertens 16780 County Hwy X Chippewa Falls WI 54729	Geographic Split	I am writing in reference to docket number 5-Tn-100 the changes to the 715 area code. My husband and I both own separate businesses and we feel that the overlay plan would be horrible and unwieldy. If we add new phone lines we would have two separate area codes within our own business. This seems ridiculous to us. If we need to change our letterhead and business cards to a different area code that would be a minor one-time inconvenience as opposed to the daily annoyance of having to dial an area code for each and every number that we call and trying to keep track of which of our clients have which area codes. Please tell that this is something the phone company throws out there for more consideration just to make a simple area code redistribution more palatable by comparison. Plan number 6 sounds acceptable but anything would be better than an overlay please no no no to the overlay plan!!!!	Business
166	Erin Young 413 10th St. Menomonee MI 49858	Overlay	The split would have to directly change on our side of the Border: IP there were more definite information on which side would be assigned the new number.	Residential

Comments Received for the 715 Area Code

No.	CONTACT INFORMATION	SUPPORT SPLIT OR OVERLAY	COMMENT	Business or Residential
167	Robyn Tonkin 716 Arbutus Street Rhinelander WI 54501	Overlay	I read with interest the Notice of Investigation concerning area code relief for Northern Wisconsin. I do not agree at all with the industry finding that a geographic split plan for area code relief would cause hardship to industry. In this day and age industry prints letterheads business cards billing forms check and government documents such as W-4 forms in the workplace using workplace computers and office publishing software. I myself a housewife own a device which prints copies scans and faxes quite credibly and I bought the machine for \$55. Furthermore I do not believe that "industry" should have the deciding voice in this matter. "industry" may pick up and leave for someplace else at any moment as the people of the Northwoods well know. "Industry" furthermore wastes telephone numbers there would not be a shortage of telephone numbers if it weren't for the proliferation of questionable uses for them - such as an individual customer having a home landline telephone number and a second telephone number dedicated to their voice mail. So in my opinion the residents of Northern Wisconsin since we are going to be residing here and will feel the greatest effect from an area code change should have the deciding voice in whether an overlay or geographic split is used when a new area code is implemented. In this matter I concur with "industry". I do not wish to have to use an area code every time I make a telephone call doing so somehow interferes with my perception of my hometown area as folksy or "small town". However using the overlay approach will cause the least upset. This will be the most seamless way to accomplish implementation of a new area code and cause the least dislocation to the greatest number of people. Therefore I believe that the overlay approach should be the preferred alternative when a new area code is introduced to Northern Wisconsin. Thank you for giving me an opportunity to comment.	Residential
168	Brad Tander 3 Division Street Chippewa Falls WI 54729	Geographic Split	I had read of the public meeting at the Eau Claire Senior Center and had thought of going. I read in the Chippewa Herald today a quote by Marty Gree resident of Eau Claire: "Any plan is better than the overlay for the western part of Wisconsin". I agree with this comment. While an overlay plan may be convenient for business an overlay plan mandates the area code to be dialed for local numbers an inconvenience most do not want to deal with. While there may be speed dial and redial to mitigate the extra numbers in some cases some dials will still have to be done from scratch. Giving businesses some sort of credit for one time having to make new identification cards for a new area code is far less inconvenient than permanently imposing extra numbers on everyone every time they make a phone call.	Residential
169	Randy and Blythe Richards 8245 N County Rd G East Oma WI	Geographic Split	This note is a vote for "geographic split" in the area code change plan for Northern Wisconsin.	Residential
170	Larry & Peggy Priem 16301 State HWY 178 im Falls WI 54748	Overlay	I prefer alternative six the least desirable - overlay	Residential
171	Judy Pinkoski 1301 Baxter Avenue Superior WI 54880	Overlay	I would like to see us be progressive. I have three numbers one being a cell where I do have to dial the area code now. If it does end up with a split I would like to see the 715 area code stay on the west side of Northern Wisconsin as we have so much with MN going on. Thanks for coming up here.	Residential

Comments Received for the 715 Area Code

No.	CONTACT INFORMATION	SUPPORT SPLIT OR OVERLAY	COMMENT	Business or Residential
172	Kristine Ostrander 547 Burr Oak Place Rice Lake WI 54868	Geographic Split	The eye of the "Indian" is Rice Lake WI. It is also the "midway point" of a lot of traffic. I'm for a geographic split and believe that Rice Lake shouldn't have to use the area code's for Barron any Rice Lake number or Birchwood. I think it should stay the same and dialing that many numbers would be too much to ask for. As far as other country go (not including Barron and Washburn) I can see it. Even now when I dial out of areas I have to use the area code 715. There must be a simpler answer?	Residential
173	Phil Jaucwitz 1017 N Old Wausau Rd Stevens Point WI 54481	Overlay	The overlay makes the most sense a number of people already use 18 digits plus for long distance calls. Also numerous cell phones use the ten digit numbers anyway and also cell phones are replacing hard wired devices to in my opinion I would favor the overlay Vs. a Geographic split. A good majority of the devises already use 10 digits or can be programmed to den digit dialing.	Residential
174	Margaret Hosking 1263 Bloom Rd Eagle River WI 54521	Geographic Split	I am against having an overlay in the 715 area code. I have looked at all of the options proposed and feel option 2 is the best one. It would be too hard to remember who has which are code in the same city! Please take this into consideration.	Residential
175	Marty Green 2860 Mercury Eau Claire WI	Geographic Split	Split the area similar to what was done in Green Bay and Appleton NE Wisconsin. I have lived in both Green Bay and Eau Claire since 1966	Residential
176	Tom and Janice Clarke	Overlay	We would prefer that the PSC assign new codes to new users. It's not only businesses that would have to change but everyone. We would have to notify the businesses we deal with as well as family friends doctors insurance companies and banks etc. We would all have to learn a new code. New users would have an easier time learning their number. there wouldn't be any confusion. We've had this code for a number of years. Why should we have to change?	Residential
177	Stephen Byrd 18866 72 Avenue C hippewa Falls WI 54729	Geographic Split	I would like to see the 715 area split into two areas where one part would keep the 715 area and one area would get a new code. About one half of the people involved would then not be affected at all and the others would be inconvenienced short term by the switch to a new code but the big advantage for the long haul would be not having to dial an area code for every call. I don't have an opinion as to which of the 5 split alternatives are selected I just feel strongly that the split method is far better than an overlay plan.	Residential
178	Gary Beckmann	Geographic Split	Of the two options I would rather see a geographic split. Thank you!	Residential
179	Bruce Behnke	Geographic Split	My vote is to just assign another area code. Do not overlay my wife is also in agreement with this.	Residential
180	Roger Berg 9 14 Eddy Lane Eau Claire WI 54703	Geographic Split	Dividing the 715 area code makes sense better than (overlay) anew code over the 715 area code in the same neighborhood. I am sorry I can not attend any hearings on the subject because of my work schedule so I will give you my ideas on this should be split. Between the city of Curtiss and Abbotsford on Hwy 29 draw a line south to the 608 are code and going north on the line from Hwy 29 between Cty Rd. E and Hwy 13. When you get to Hwy 8 go between catawba and Prentice and go north where Why 13 bends between Prentice and Phillips go to the east about 10 miles and then go north a crossing Hwy 70 and Hwy 182 about 30 miles east of Park Falls and head north to 30 miles south of Hurley to State line of Michigan.	Residential

Comments Received for the 715 Area Code

No.	CONTACT INFORMATION	SUPPORT SPLIT OR OVERLAY	COMMENT	Business or Residential
181	Linzmaier PO Box 250 Chippewa Falls WI 54729	Geographic Split	I propose that two new area codes be created now. State Sen. Sheila Harsdorf is saying that another area code may have to be created for western Wisconsin within the next nineteen years. Why not do it now? Why wait nineteen years and disrupt phone customers a second time within the next nineteen years. Why not do it now? Why wait nineteen years and disrupt phone customers a second time within a few years? Plan ahead now. I propose dividing the 715 area code with lines north and south. These lines should divide the present 715 area code based on the present population and the projected growth to create three areas of equal population. The 715 area code should remain in the eastern section of Wisconsin.	Residential
182	Richard Short 900 Park Lane Eagle River WI 54521	Geographic Split	I am in favor of splitting the area rather than the overlay method because of the 10 digit dialing on local calls.	Residential
183	Jean and Wayne Thompson	Geographic Split	At this time we feel the extra numbers using the area code local is a problem- will you please split up 715 make one new -	Residential
184	Breck Lillyblad	Geographic Split	Please split the 715 area code into two (or more for the long run) separate areas. The area that keeps 715 comes out without any changes. The new area code(s) will need to make some adjustments. However those adjustments will be made over a relatively short time. The overlay will cause problems forever. You should look at the long run on this issue. And while you are at it maybe create more than one new area code so that this issue will not come up again for a very long time - maybe never. Everybody would like to retain 715 but of course that is not possible. I believe most people would understand and choose this method. If my area is picked to change I can live with that (and I have three businesses).	Business
185	Floral Garden Inc. Jennifer Reis 3015 E. Hamilton Avenue Eau Claire WI 54701	Overlay	Please add our business to the list of <u>not</u> wanting an area code change- this would be a business hardship.	Business
186	Sprint Spectrum L.P. and T- Mobile Comments	Overlay	See PSC REF# 84312 for Industry Comments	Industry
187	AT&T Wisconsin - AT&T Mobility	Overlay	See PSC REF# 84249 for Industry Comments	Industry

Comments Received for the 715 Area Code

No.	CONTACT INFORMATION	SUPPORT SPLIT OR OVERLAY	COMMENT	Business or Residential
189	Amery Telcom Inc. Michael Jensen 120 Birch Street W. Amery WI 54001	Geographic Split	On behalf of Amery Telcom Inc. and Somerset Telephone Company Inc. I am writing to encourage the Commission to adopt a geographic split of the 715 area code rather than an overlay. Understanding that both methods of area code relief planning have various drawbacks and benefits I believe that a geographic split is the best solution with the impending exhaustion of the 715 area code. A geographic split has proven to be effective in other areas of Wisconsin. When considering other area code relief plans the Commission has continually adopted geographic splits. This is an indication of the importance that the Commission has placed on ease of use (i.e. 7-digit rather than 10 digit dialing) and the significance residents place on an area code as being an identifier of a specific geographic region. Applying an overlay would require 10 digit dialing throughout the area code overlay. While there are examples of rural area code overlays in the US large rural areas like the 715 territory will be better served with a geographic split that creates two distinct area codes. Also I want to comment on the characterization of the overlay as being the "industry consensus" plan. As one of the parties that took part in the conference calls on this issue in 2002 I recall that the rural Wisconsin-based carriers were generally in favor of a geographic split. While the final vote may have been in favor of an overlay the Commission should be aware that it was not a unanimous decision. I believe that the customers of Amery Telcom and Somerset Telephone Company will be better served with a geographic split rather than an overlay plan.	Industry
190	Alltel Communications Inc.	Overlay	Please see PSC REF# 83440	Industry
191	TDS Telecommunications Inc.	Overlay	Please see PSC REF# 83430	Industry
192	Verizon	Overlay	Please see PSC REF# 83427	Industry
193	Lakeland Communications Inc. 825 Innovation Avenue Milltown WI 54858	Geographic Split	Lakeland Communications is a telecommunications company in Northwest Wisconsin that resides in the 715 area code. Lakeland Communications is less concerned about the impact on switching capabilities but rather places a priority on representing the interest of our customers who want ease of use of the public switched network. We serve many customers who feel land line service is necessary to them because of the ease, simplicity and reliability of the service. Lakeland Communications feel as a result of the response from customers the need for 10-digit dialing takes away the ease of use our customers value. In addition to the ease of 7 digits there is the simplicity of recognizing an area code as a geographic area. Wisconsin is still a state where people have pride in anything that distinguishes them geographically including area codes. For these reasons Lakeland Communications believes a geographic split will best serve our customers regardless of which split is chosen. However an east/west split previously recognized as the Northeast/Northwest plan endorsed by the State Senator Shelia Harsdorf and Representative Ann Hrachuk appears to be the best alternative for two reasons. First there is a close proximity to the Minnesota twin cities. As noted in the September 10th letter from Wisconsin legislators there is a substantial economic link between the Twin Cities and Western Wisconsin as well as between Duluth and Superior which is unique to our part of the state. Second due to the nearness to a large metropolitan area growth in the Western region of the 715 area code will likely increase more rapidly than it may in the more rural eastern portion. Lakeland Communications would like to recommend to the Commission that it employ a split as has been historically customary in Wisconsin to alleviate the area code exhaustion in the 715 area code.	Industry

Comments Received for the 715 Area Code

No.	CONTACT INFORMATION	SUPPORT SPLIT OR OVERLAY	COMMENT	Business or Residential
194	WE Energies 231 W. Michigan Street Milwaukee WI 53203	Overlay	We Energies is filing the following comments on the area code changes for the 715 and 920. We would prefer that the new area code for the 715 and 920 area be implemented using the overlay plan. The overlay method involves only NEW numbers being assigned the new area code while current numbers remain with the existing area code of 715 and 920. This does not require any extra work to implement on our part. With the geographic split plan all current numbers that would fall into the new area code must be changed which would then require us to change all currently stored phone numbers that fall in the new area in our various applications. This would take some work to implement.	Industry

Comments Received for the 920 Area Code

No.	CONTACT INFORMATION	SUPPORT SPLIT OR OVERLAY	COMMENT	Business or Residential
1	Kelly Smilanich 2201 Sunnymede Lane Green Bay WI 54311	Geographical Split	I strongly favor the split rather than the overlay for the 920 are code. Because there is ample time to prepare, there is not a hardship for businesses to have to change their area code if they are in the portion of the area code that changes. If there is an overlay it will require 10 digit local calling which is much more difficult over the long run.	Residential
2	Jerry Borchardt 206 Oak Hill Ct. Watertown WI 53094	Geographical Split	I much prefer the option of dividing the current 920 are code and creating a new area code for the other half. In fact, couldn't you divide it in 3 areas, so it would even last longer? I realize those of us getting the new area code would not be too happy, but we would get use to it, and would be much better than having to dial all 10 digits, even when calling your next door neighbor. Thank you for allowing input on this project.	Residential
3	Janina Kroll 224 E. Spaulding St Watertown WI 53098	Geographical Split	I do not like the idea of an overlay and having to dial my area code with every call. I would prefer a new area code. I received the 920 code when the 414 area was split and I'm willing to have yet another area code. I do NOT like the overlay option. Thank you.	Residential
4	Ken Langenhahn W8932 Liberty Hill Ct New London WI 54961	Overlay	I would be much more in favor of having an overlay rather than the split option. As a small business owner having to reprint my promotional material (Business cards, flyers, postcards, billboards, etc) that would be a very hard burden to overcome. And that's not to mention the time in man hrs it would take to change all of the information on the web. A great deal of my new clients, when asked how they new about me, said they say or received something a year ago and longer, an put it in a file for the future. Please consider the overlap as the best choice, small business would be hurt if a split area code went into affect and could likely destroy start up companies who do not have the funds to absorb this kind of loss.	Business
5	Vern Schmitt 125 E Pacific St Appleton WI 54911	Geographical Split	I would prefer an area code split, for several reasons. First, dialing 1 + area code + number for EVERY call would not easily be accepted. Second, a caller would have no way of knowing if the call is being billed as a local call or long distance call. I sell telephone systems as a business, and the dialing confusion would be a real problem as well. A multiple split (adding several new area codes) might also be a good decision, so this problem would not appear in another five years.	Residential
6	Jim Parfitt 1018 Cardinal Street DePere WI 54115	Overlay	All the options are not looking far enough out. In most of the options in another 20-30 years we will have to readdress the same issue. Can we ask for a longer term plan? Although the overlay method may seem confusing, it will allow Green Bay and the Fox Cities and Manitowoc to be in the same area code. At the office calls are made to these areas. It is long distance but the same area. This would be maybe a better choice as we could ask to have three area code overlays all now. That way we do not have to deal with it again til 50 years from now. If a geographic split were the one choice to have, I would ask that any of them that keep Appleton, Oshkosh and Green Bay in the same area code would be preferable.	Residential
7	Paul Dettman Watertown WI 54098	Geographical Split	I would prefer to see a separate area code established and not an overlay. A overlay would lead to misunderstanding and confusion.	Residential
8	Gary DeNamur 127 S. Ninth Avenue Sturgeon Bay WI 54235	No Preference Disclosed	Short sited original decision! Seems to me that it wouldn't have taken a rocket scientist to know that the original decision was the wrong one. Why pick on an area with fewer telephone density? Having chosen say the Milwaukee area would have generated many more possible number combinations. So, not that long ago you changed our area code from 414 to 920 and now it looks like you are going to have to make a change again, by 2010. Why compound the problem, go to the source of the bigger number of users and gain more possible numbers by changing THEIR AREA CODE! Sure sorry I missed your public comment session here in Sturgeon Bay yesterday, but some of us have to work for a living!	Residential
9	Mike Donovan 1404 Ponderosa Ave Green Bay WI 54313	Geographical Split	I would prefer to have an area code split rather than an overlay.	Residential

Comments Received for the 920 Area Code

No.	CONTACT INFORMATION	SUPPORT SPLIT OR OVERLAY	COMMENT	Business or Residential
10	Joanne Hesselink W2838 Eagle Rd. Neshkoro WI 54960	Geographical Split	I understand the reason for making area code changes, but PLEASE do it geographically, not just with the new customers within an area. I certainly DO NOT want to have to dial 10 numbers each time I call my neighbor or local store!!!	Residential
11	Timothy Graul 211 N 3rd Avenue Sturgeon Bay WI 54235	Overlay	I favor the addition (overlay) of a new area code. When Ones' Area Code is changed, i.e., an existing Area is reduced in size and a new Area Code is assigned, callers to one whose area code has been changed either hear nothing, or a cryptic announcement that "that number has been changed", or even worse, "that number is no longer in service". For businesses such as my own, that can be fatal, because callers may assume the business has closed or moved away. This is compounded by the fact that telephone providers charge prohibitively for directory assistance. As a result, most callers do not look any further. thank you for considering this comment favoring the overlay solution.	Residential
12	Mary Rasmussen 343 Laverne Green Bay WI 54311	Geographical Split	I'm not sure this is an opinion website, but if it is, I want to say that I would be okay with either option but would prefer the geographic split.	Residential
13	Robert Hollen 920 Lincoln Blvd. Manitowoc WI 54220	Geographical Split	At first glance I would go for a geographical split. I don't know how they would do it. If it was cut down the middle I could see myself paying for a long distance call. Because you always pay long distance to another area code.	Residential
14	Kathy Thunes 1724 S. Sundown Lane Appleton WI 54915	Geographical Split	I would like to comment on the area code relief for the 920 area code. It is my understanding that the Commission is looking at either splitting the area code or using an overlay. I would like to go on record against an overlay. I feel that this would be extremely confusing and frustrating since it would be difficult to tell if the number I need to dial is a 920 area code or the new one. It would also be annoying to have to dial the additional numbers. While cell phones or other phones that are preprogrammed automatically dial the number, more often than note, I find myself dialing a number that is not preprogrammed.. While I would not be in favor of changing all my address labels, stationary and contracting friends and relatives, I would much prefer to do this over the alternative. I sympathize with businesses that do not want the added cost, but in reality the cost to reprint labels, stationary, etc. is a one time expense, while the frustration and confusion of two area codes will be forever. I sincerely hope that you give my comments consideration.	Residential
15	James Janes 5866 Harbour South Butte des Morts WI 54927	Wireless Overlay	I own four businesses and in the past year completely redid our marketing. If I had to do over it would cost me in excess of \$20,000 which is a large sum for a \$8,000,000 business. As I see it, the problem has been created by cell phones. Why can't we just provide a separate area code for the cell phones in the 920 area code. Cell phones numbers and not published, they are seldom on letterhead or brochures, and most people know when they are calling a cell phone instead of a land line. I propose that this alternative be added to the discussion.	Business
16	Mark Rohloff 1900 Grand Chute Boulevard Appleton WI 54913	Geographical Split	The Town of Grand Chute understands and supports the need to add a new area code in the 920 area of NE Wisconsin. Our preference is in the geographic split, specifically Geographic Split #2. Our reasons are that we prefer to maintain the convenience of 7 digit dialing for local calls. We also recall that the geographic split of the 414/920 went well back in the 1990's, so we believe that the same transition can occur again. We prefer alternative #2 because it maintains the same area code for Appleton and Green Bay, who are strong economic partners and would benefit from maintaining the same area code as much as possible. Alternative #2 also keeps the split on more of a north-south split, which maintains some of that economic consistency previously mentioned, as well as a medial split that is generally used more (NE Wisconsin vs. Madison and Milwaukee Markets).	Business
17	Gene Goode 205 West Street Fremont WI 54940	Geographical Split	I would request you split the area code geographically and not institute an overlay. I can see a lot of confusion and misdiald phone numbers using an overlay.	Residential

Comments Received for the 920 Area Code

No.	CONTACT INFORMATION	SUPPORT SPLIT OR OVERLAY	COMMENT	Business or Residential
18	Gary Whitney 7727 Maas Drive Verona WI 53593	Geographical Split	I would like to go on record in favor of an area code 920 split versus an overlay. - thank you	Residential
19	Janel Zielke W6905 Arbor Road J uneau WI 53039	Overlay	I believe using the overlay would be the best solution. Those already using the 920 area code would not have to go through the hassle of making changes in so many places that a phone number is used. Assigning a new area code to new users would simplify the procedure in many aspects.	Residential
20	Kara Homan 3086 Winnipeg St Menasha WI 54952	Geographical Split	I write to indicate that I am in favor of the 920 area code split. We all survived through the 414 years ago, and splitting again is the only logical solution. Historically, area codes have been geographically based, and knowing what area code you were dialing gave you a general sense of the location you were calling. The overlay option seems like a ridiculous solution, in terms of convenience, customer ease, and public safety. I think that many would agree with the statement that they would prefer to only dial 7 digits when possible. This is especially true for you children--calling home, calling the police, or making any other phone calls will become increasingly more complicated and difficult. PLEASE DO NOT CHOOSE THE OVERLAY OPTION!!!!	Residential
21	Allan Voss 3802 S. 18th St. Sheboygan WI 53081	Geographical Split	I am strongly opposed to an overlay plan for the new 920 number. I am the partner in a law firm which would have to change many things such as letterhead, business cards and other stationery; however, I would much rather put up with the short-term inconvenience of doing that than the long term inconvenience of having to keep track of which area code to use for all of the calls that I make every day. having to dial an extra 3 digits for every local call is a major inconvenience for someone like me who spends much of the day on the phone.	Business
22	Barbara Olm 14537 Squire Lane Kiel WI 54032	No Preference Disclosed		Residential
23	Ron Griesbach 736 John St. Menasha WI 54953	Geographical Split	I do not feel an overlay of the two area codes is the answer. I feel we need only one area code per area. This would be less confusing for a long time. It however requires more effort to set it up in the beginning.	Residential
24	Mike Winnekens 3701 MacArther Dr. Manitowoc WI 54220	No Preference Disclosed	Splitting the area codes would put me on roaming so much, my cell wouldn't be worth it.	Residential
25	Lois Reischl 625 Reichow St. Oshkosh WI 54902	Geographical Split	I'd appreciate consideration that the calling areas be split rather than an overlay.	Residential

Comments Received for the 920 Area Code

No.	CONTACT INFORMATION	SUPPORT SPLIT OR OVERLAY	COMMENT	Business or Residential
26	Clive Frazier PO Box 172 Hustisford WI 53034	Geographical Split	I spend summers in Dodge County and winters in Orlando Florida. In Orlando, they recently did the OVERLAY option when they ran out of central office codes. WHAT A MESS! I was in favor of SPLITTING the area code, but the PSC went with the OVERLAY. As a result, you always have to dial 10 digits to call your neighbor. Even worse, some of the neighbors have added a second phone line into their home for their computer. I do not remember how many times I dialed the WRONG AREA CODE for that phone line. The OVERLAY method is causing nothing but problems for the average user/customer. With a SPLIT area code, that problem goes away. Everyone can picture the Area Codes for their home state and instinctly know what to dial. Some business people say they will have to reprint their advertising literature. With all the junk mail I get, I think they are sending out a lot of advertising literature. yes, there would be a period where they have literature with the old Area Code, but that would quickly pass. I remember when the 407 Orlando area code was split from the 305 Miami area code years ago. There was a several year phase in, where if you called the wrong area code, you were given a recorded announcement that the area code had changed but I think the call went through. Then for another period of time, you got the recorded message announcement, but you had to call again. No big deal, I think this whole process took one to two years. If this overlay is such a great deal, why didn't Wisconsin just keep it? Wisconsin always had 414, 608, and 715 Area codes. When more numbers were needed in Milwaukee, why did the area get split into 262 and 920? Split worked then. Split always works. If overlay is such a great idea, why didn't Milwaukee get overlayed, TWICE? Overlay is a real hassle. Bottom line, I am AGAINST the overlay system. I have to put up with it in Florida. I do NOT want to deal with it here in Wisconsin.	Residential
27	Amanda Geller 1016 Tana Lane Menasha WI 54952	Overlay	I'd like to see the overlay of telephone numbers. Anyone who has the 920 area code can keep it and new numbers would be assigned the new area code. In doing this it would save a lot of companies and people money by not having to get new biz cards, letter head, etc. and not having to let their customers know the change in area code. I don't think it would be that much inconvenience for the public to dial the area code when calling since most everyone will still be 920 and only new businesses/residential numbers will be a new area code. Cell phone users especially won't be inconvenienced because these numbers need to be programmed in once and then there is no future hassle in having to dial the area code.	Residential
28	Dale Reindl 2109 East River Street Two Rivers WI 54241	Geographical Split	The 920 area code should be split not overlayed. We go through it before and can do it again.	Residential
29	Connie Kennedy 4448 Seminole Trail Green Bay WI 54313	Geographical Split	The code relief should be handled with a geographic split. This is the way it was handled in the Chicago area and worked fine.	Residential
30	Dana Miller 4611 Cty Hwy T Oshkosh WI 54904	Geographical Split	I would prefer not to have an overlay. It would be quite a pain to have to dial an area code for local calls as well as long distance. This would greatly affect me at work as I make many local calls in a day. Please consider not using an overlay.	Residential
31	Dave Moody 2644 Hilly Haven Road Green Bay WI 54311	Geographical Split	I am in favor of the geographic split. I am not interested in 10 digit dialing. While you're at it, why don't you "split" the regions in 3 right away so that this process does not have to take place anywhere in the near future.	Residential
32	Michelle Snyder N1559 County Road T Hortonville WI 54944	Overlay	I would like to see the new area code overlap the existing ones. I think long term that is where we're headed and to split the area code and assign new area codes to those who already have numbers creates a large burden on consumers and home owners. It's difficult for school age children (who are at the age where they have just learned or are learning their phone number....even those who are older and know their relatives numbers). It's a large financial burden for businesses who have their numbers printed on signs/vehicles/business cards/ads, etc. Existing numbers should stay the same and new numbers should get the new codes. Yes it will be difficult, but all options pose difficulties.	Residential

Comments Received for the 920 Area Code

No.	CONTACT INFORMATION	SUPPORT SPLIT OR OVERLAY	COMMENT	Business or Residential
33	Greg Malkowsky PO Box 3004 Oshkosh WI 54903	Geographical Split	I m not in favor of the area code overlay. While I am an owner of a small business (10 Employees), I would much rather incur the expense of changing area codes than deal with dialing an area code each time that I would dial a local number. I would prefer to keep the 920 area code but I understand that someone needs to change and would not be opposed to changing to a new area code.	Business
34	Dawn Wallander 1935 31st Street Two Rivers WI 54241	Geographical Split	Please do a split to the 920 area code, leaving Green Bay/Brown County as 920, and switch the rest of the area including Manitowoc/Sheboygan counties.	Residential
35	Joy Kamba N3063 State Road Chilton WI 53014	Geographical Split	I think it should be split the east and west. I think it's proposal 1. Thank You!	Residential
36	Deb Eckstein 2015 Ashland St. Oshkosh WI 54901	Geographical Split	I don't know what the big deal is about changing area codes. We did it several years ago from 414 to 920. Instead of adding 1 or 2 area codes to our state then running out of numbers within 10 years, why not add 4 or 6 area codes right away? I believe area codes should remain 1 area code per area, not several area codes for an area then having to dial everyone's area code. Don't make this so complicated. Just do it.	Residential
37	Kurt Miller 425 14th Avenue #4 Green Bay WI 54303	Wireless Overlay	I really wouldn't mind it one way or the other if it changes unless this change will affect those with cell phones as well. I have used a landline phone in almost ten years, or since getting my cell. That is an area I would like to hear more about, if this change is going to at all effect those with cell phones in these areas.	Residential
38	John Ashburn 2720 S 14th Street. Sheboygan WI 53081	Overlay	I'm in favor of the overlay system where new numbers would get a new area code and existing numbers stay with the 920 area code.	Residential
39	Steve Helmer 611 E. South St. Beaver Dam WI 3916	Geographical Split	I use to live in an area where we had to dial the area code for all our phone calls and it was a major inconvenience. It also made it more difficult to tell if a number was a local number or long distance number so I would be supportive of adding another area code. I would suggest splitting it along the Lata Line with the new area code either being north of it or south of it.	Residential
40	Tammy Geissler 611 Foldenrod Drive Appleton WI 54914	Overlay	#3	Residential
41	Joe Krentz 18714 Harp Lake Rd Denmark WI 54208	No Preference Disclosed	10 years ago it was said it would be 20+ years before this was needed and the plans give the same time line of 20+ years I think you need a more realistic plan you need to think about a few things here especially in the rural areas the zip code I live in covers several different latas Denmark, tish mills, Mishicot Kewaunee and not to mention that those of us in rural areas get our cell numbers from the larger surrounding cities in this are mostly green bay but there is also Manitowoc on top of this who is to pay for all the new signage that will be required due to the poor planning of the PSC and telephone co who said this plan was good for 20+ years why should we foot the bill for your poor planning.	Residential
42	Suzanne Langohr 1646 S Park Avenue Neenah WI 54956	No Preference Disclosed	I hope that all of us will be able to keep our existing phone number, I have had my 722-8722 number for 18 years and am very sentimental about it as it was my grandmothers. It is a big inconvenience to keep changing numbers. I feel that new requests should get the new numbers. Like 921 instead of 920 or 714 for 715. Please make it fair for all and not a huge hassle for the existing customers.	Residential

Comments Received for the 920 Area Code

No.	CONTACT INFORMATION	SUPPORT SPLIT OR OVERLAY	COMMENT	Business or Residential
43	Ann Condon 4509 Cottonwood Avenue Oshkosh WI 54904	Geographical Split	RE: Alternative #2, Under alternative #2, Oshkosh would be in Lata 350, Area A; Pickett would be in Lata 356, Area B we have a Pickett exchange. The ONLY exchanges we can dial as a local call under Extended Area Service (paying a monthly charge to have "EAS") are the Oshkosh exchanges (and Pickett itself). There are two additional exchanges under Extended Community Calling we can reach without have to dial an area code (billed on a per minute basis). With probably 95% or more of our local calls being made to Oshkosh exchanges, I am concerned about what the implications of Alternative #2 would be, should that be chosen. Give the geographical area of the Pickett phone exchange, especially in relationship to the Oshkosh exchange area, I don't feel Alternative #2, with a split in are code between Pickett and Oshkosh, is the right choice. In addition, with Oshkosh being the ONLY local exchange to which Pickett can place calls, why split those exchanges into different area codes? Please contact me by phone or email if you would like further explanation of my concerns or if you have related questions.	Residential
44	James Janes Janesco Inc. PO Box 262 Oshkosh WI 54903	Wireless Overlay	In the introduction of your Notice of Investigation you state that there are fewer than 100 central office codes that remain available for assignment in the 920 area code. You also state that the increasing appearance of new service providers and the growing use by the public of items such as wireless telephones, pagers, facsimile machines, and modems have consumed additional telephone numbers. After the introduction, NeuStar, Inc., the administrator of North American Numbering Plan, identified two basic alternative: The "geographic split" and the "overlay" plan. The "overlay plan", while it does address the large cost associated with the change in printed matter, creates confusion within all communities within the 920 area code. School districts, nurseries, perhaps 911 call centers, and sure the elderly, will be affected. The "geographic split" would create less confusion, however as an owner of a small business, I redid my marketing literature over the past eighteen months at a cost of a little over \$39,000. The cost of reproducing literature for an area half the size of 920 would be large. Also, as printing is a tax deductible business, it would reduce state tax revenues. I believe that NeuStar, Inc. Omitted what would seem to be the most effective option. Assign a new area code to all wireless telephones and pagers in the 920 area code. My reasons are as follows: Most cell phones and pagers are not listed in company printed matter. Most people know when they are calling a cell phone. Many families have only one land-line but multiple cell phones. Calls between cell phones in the same area code would be seven digits. The demand for fax machines and modems is going down because of email and high speed internet through cable providers. It puts the solution at the cause of the problem.	Business
45	James Janes Derby Molded Products Inc. PO Box 262 Oshkosh WI 54903	Wireless Overlay	In the introduction of your Notice of Investigation you state that there are fewer than 100 central office codes that remain available for assignment in the 920 area code. You also state that the increasing appearance of new service providers and the growing use by the public of items such as wireless telephones, pagers, facsimile machines, and modems have consumed additional telephone numbers. After the introduction, NeuStar, Inc., the administrator of North American Numbering Plan, identified two basic alternative: The "geographic split" and the "overlay" plan. The "overlay plan", while it does address the large cost associated with the change in printed matter, creates confusion within all communities within the 920 area code. School districts, nurseries, perhaps 911 call centers, and sure the elderly, will be affected. The "geographic split" would create less confusion, however as an owner of a small business, I redid my marketing literature over the past eighteen months at a cost of a little over \$39,000. The cost of reproducing literature for an area half the size of 920 would be large. Also, as printing is a tax deductible business, it would reduce state tax revenues. I believe that NeuStar, Inc. Omitted what would seem to be the most effective option. Assign a new area code to all wireless telephones and pagers in the 920 area code. My reasons are as follows: Most cell phones and pagers are not listed in company printed matter. Most people know when they are calling a cell phone. Many families have only one land-line but multiple cell phones. Calls between cell phones in the same area code would be seven digits. The demand for fax machines and modems is going down because of email and high speed internet through cable providers. It puts the solution at the cause of the problem.	Business

Comments Received for the 920 Area Code

No.	CONTACT INFORMATION	SUPPORT SPLIT OR OVERLAY	COMMENT	Business or Residential
46	James Janes Oshkosh Marine Supply Inc. PO Box 262 Oshkosh WI 54903	Wireless Overlay	In the introduction of your Notice of Investigation you state that there are fewer than 100 central office codes that remain available for assignment in the 920 area code. You also state that the increasing appearance of new service providers and the growing use by the public of items such as wireless telephones, pagers, facsimile machines, and modems have consumed additional telephone numbers. After the introduction, NeuStar, Inc., the administrator of North American Numbering Plan, identified two basic alternative: The "geographic split" and the "overlay" plan. The "overlay plan", while it does address the large cost associated with the change in printed matter, creates confusion within all communities within the 920 area code. School districts, nurseries, perhaps 911 call centers, and sure the elderly, will be affected. The "geographic split" would create less confusion, however as an owner of a small business, I redid my marketing literature over the past eighteen months at a cost of a little over \$39,000. The cost of reproducing literature for an area half the size of 920 would be large. Also, as printing is a tax deductible business, it would reduce state tax revenues. I believe that NeuStar, Inc. Omitted what would seem to be the most effective option. Assign a new area code to all wireless telephones and pagers in the 920 area code. My reasons are as follows: Most cell phones and pagers are not listed in company printed matter. Most people know when they are calling a cell phone. Many families have only one land-line but multiple cell phones. Calls between cell phones in the same area code would be seven digits. The demand for fax machines and modems is going down because of email and high speed internet through cable providers. It puts the solution at the cause of the problem.	Business
47	Wagon Trail Resort Bob Czerniakowski	Geographical Split	This purpose of this letter is to address the implementation of the new area code for the current 920 area. As business owners/operators in Door County, our perspective is based on our own experiences with the transient/tourist customer base. We understand to complexity of the issue and would like to make several points. Among us, we have relatives and friends in several communities with the overlay method of area code change. No one has reported much that is positive. Confusion is apparently widespread having a negative impact on everyone in that community for a few years. As a tourism-based community, we know that Door County will experience more of a decline in business due to this sort of confusion than areas that enjoy a more stable/non-transient commerce. For the reason above, it is our feeling that the split area code method would be more practical. Areas with a more stable client-base should experience the change, where funds (if there are any?) for community support and publicity can be focused an thus maximized. These areas include north, west, and south of Green Bay and the Fox Cities where it is less populated and the fewest transient-client businesses would be affected. Tourist dependent Door County's area code should remain (920) the same. We realize that it is not easy for anyone to experience any change of this type- we have already experienced an area code change from (414). No one wants to have to change ads, stationary, promotional materials, etc. It cannot be ignored that because of the nature of our primary local commerce, we stand the highest risk of an overally negative impact to businesses and economic health of the community We appreciate your thoughtful consideration on behalf of all 920-area residents.	Business
48	Fred Goebel 5728 S 12th St Sheboygan WI 53081	Overlay	I would like to suggest a number for the area code. 920 was Reggie White's number. I suggest it be 560 for Nick Barnett's number.	Residential
49	William & Margaret Bordihn, N1239 18th Rd., Dalton, WI 53926	Geographical Split	Yesterday I heard on PBS radio that the telephone area code 920 may have to have the area split into two and one section may get a new area code for their phone number. This is also true for the area code 715. Those people with area code 920 have until November to register any comments on the situation but I am writing today. We have lived at our present location since January of 1990 and have had our area code changed once already and our address changed from a box number to a road address. It has not bothered us. As a matter of fact it was fun and since I am a Gemini I like change. If it is necessary to split the land area of people with area code 920 into two and give half the people a new area code - just don't it! Don't even ask the public. If something is necessary - Just do it. There is no choice it is necessary.	Residential

Comments Received for the 920 Area Code

No.	CONTACT INFORMATION	SUPPORT SPLIT OR OVERLAY	COMMENT	Business or Residential
50	AT&T Wisconsin/AT&T Mobility	Overlay	See PSC REF # 85007.	Industry
51	TDS Telecommunications Corp. Jean Pauk 525 Junction Rd. Madison WI 53717	Overlay	See PSC REF #85000.	Industry
52	Sprint Spectrum/T-Mobile	Overlay	See PSC REF#84998.	Industry
53	Level 3 Communications	Overlay	See PSC REF #84903.	Industry
54	Powercom 1807 N Center Street Beaver Dam WI 53916	Overlay	The overlay is significantly less expensive to implement for consumers and for the Telecommunications industry. The geographic split absolutely has some positive attributes however, they do not outweigh the additional expenses involved to implement such a change. The programming involved for us as a CLEC to implement the overlay, is drastically less than that of the geographic split. The geographic split also inflicts considerable hardship on business customers who must change their phone number and everything that markets it to their customer base.	Industry
55	We Energies 231 W. Michigan St Milwaukee WI 53203	Overlay	We Energies is filing the following comments on the area code changes for 715 and 920. We would prefer that the new area code for the 715 and 920 area be implemented using the overlay plan. The overlay method involves only NEW Numbers being assigned the new area code while current numbers remain with the existing area code of 715 or 920. This does not require any extra work to implement on our part. With the geographical split plan, all current numbers that would fall into the new area code must be changed which would then require us to change all currently stored phone numbers that fall in the new area in our various applications. This would take some work to implement.	Industry
56	Verizon Wireless 205 N. Michigan Avenue 11th floor Chicago IL 60601	Overlay	See PSC REF# 84996	Industry
57	Alltel Communications Inc.	Overlay	Please see PSC REF# 83440	Industry

Industry Comments Received for the 715 and 920 Area Codes

NO.	CONTACT INFORMATION	SUPPORT SPLIT OR OVERLAY	COMMENTS
1	Sprint Spectrum L.P. and T-Mobile Comments	Overlay	See PSC REF# 84312 for Industry Comments
2	AT&T Wisconsin - AT&T Mobility	Overlay	See PSC REF# 84249 for Industry Comments
3	Level 3 Communications LLC	Overlay	<p>I am writing to submit the following brief comments in response to the August 31, 2007 Notice of Investigation of Area Code Relief for the 715 Area Code in Northern Wisconsin (Docket # 5-TN-100) issued by the Public Service Commission of Wisconsin(PSC) on behalf of Level 3 Communications, LLC (Level 3). Level 3 understands that the continued development of and demand for new, innovative and competitive services that require telephone numbering resources places pressure on the North American Numbering system and has played a role impending exhaust of available numbers in 715 area code. Level 3 supports the PSC's efforts to extend the life of the 715 service territory, whether by split or overlay. These efforts by the PSC will help the continued advance of competitive, innovative services that are available to end-users in the new communications related to their phone number. As the PSC has stated in its Notice, either a split or an overlay would expand the numbering resources available in the 715 area code territory but the overall costs and benefits may differ from one approach to the other. With a split, geographic boundaries still clearly distinguish the distinct area code region. Additionally, in the area code region, seven-digit dialing will be available for local calls. Furthermore, individual end-users and businesses in the non-affected region would not need to change their business materials or other representation of their telephone numbers. However, one of the principle draw backs to an area code split is that end users in the new area code territory would need to change their number along with any business materials or other communications related to their phone number. the principle hardship on end-users with the implementation of an area code overlay is that it necessitates ten-digit dialing for local calls that used to be made with save-digit dialing. Some amount of consumer dissatisfaction with the 10-digit dialing by -product of an overlay can be anticipated. nevertheless, Level 3 believes that recent experiences across the country with similar efforts to extend the life of area codes that are nearing exhaust indicate overlays are a somewhat more preferred approach to splits. Although resource exhaustion is predicted to occur somewhat more quickly with an overlay approach, the exhaustion rate is not dramatically different overall. Level 3 believes that given a roughly equal benefit in extending the life of the numbering resources in the current territory that the negatives are less with an overlay than they are with a split. Allowing current customers to maintain their current phone number while new customers are issued numbers in the new area code is a logical and somewhat smoother transition for end users in Level 3's opinion. Therefore, the forgoing reasons Level 3 would recommend the use of an area code overlay rather than a split to relieve the current pressures on the available resources in the 715 area code.</p>

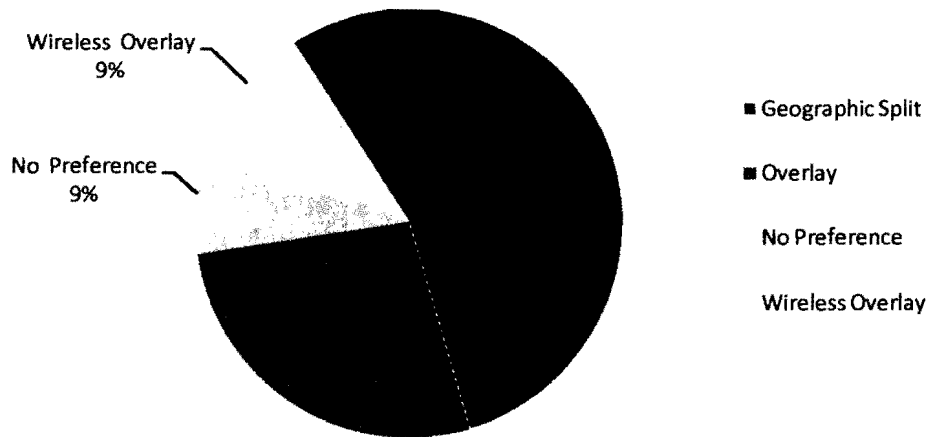
Industry Comments Received for the 715 and 920 Area Codes

NO.	CONTACT INFORMATION	SUPPORT SPLIT OR OVERLAY	COMMENTS
4	Amery Telcom Inc. Michael Jensen 120 Birch Street W. Amery WI 54001	Geographic Split	On behalf of Amery Telcom, Inc., and Somerset Telephone Company, Inc., I am writing to encourage the Commission to adopt a geographic split of the 715 area code rather than an overlay. Understanding that both methods of area code relief planning have various drawbacks and benefits, I believe that a geographic split is the best solution with the impending exhaustion of the 715 area code. A geographic split has proven to be effective in other areas of Wisconsin. When considering other area code relief plans, the Commission has continually adopted geographic splits. This is an indication of the importance that the Commission has placed on ease of use (i.e., 7-digit rather than 10-digit dialing) and the significance residents place on an area code as being an identifier of a specific geographic region. Applying an overlay would require 10-digit dialing throughout the area code overlay. While there are examples of rural area code overlays in the US, large rural areas like the 715 territory will be better served with a geographic split that creates two distinct area codes. Also, I want to comment on the characterization of the overlay as being the "industry consensus" plan. As one of the parties that took part in the conference calls on this issue in 2002, I recall that the rural Wisconsin-based carriers were generally in favor of a geographic split. While the final vote may have been in favor of an overlay, the Commission should be aware that it was not a unanimous decision. I believe that the customers of Amery Telcom and Somerset Telephone Company will be better served with a geographic split rather than an overlay plan.
5	Alltel Communications Inc.	Overlay	Please see PSC REF# 83440
6	TDS Telecommunications Inc.	Overlay	Please see PSC REF# 83430
7	Verizon	Overlay	Please see PSC REF# 83427
8	Lakeland Communications Inc. 825 Innovation Avenue Milltown WI 54858	Geographic Split	Lakeland Communications is a telecommunications company in Northwest Wisconsin residing in the 715 area code. Lakeland Communications is less concerned about the impact on switching capabilities, but rather places a priority on representing the interest of our customers who want ease of use of the public switched network. We serve many customers who feel land line service is necessary to them because of the ease, simplicity, and reliability of the service. Lakeland Communications feels, as a result of the response from customers, the need for 10-digit dialing takes away the ease of use of our customers' value. In addition to the ease of 7 digits, there is the simplicity of recognizing an area code as a geographic area. Wisconsin is still a state where people have pride in anything that distinguishes them geographically, including area codes. For these reasons, Lakeland Communications believes a geographic split will best serve our customers regardless of which split is chosen. However, an east/west split, previously recognized as the Northeast/Northwest plan, endorsed by the State Senator Shelia Harsdorf and Representative Ann Hrachuk appears to be the best alternative for two reasons. First, there is a close proximity to the Minnesota twin cities. As noted in the September 10th letter from Wisconsin legislators, there is a substantial economic link between the Twin Cities and Western Wisconsin, as well as between Duluth and Superior, which is unique to our part of the state. Second, due to the nearness to a large metropolitan area, growth in the Western region of the 715 area code will likely increase more rapidly than it may in the more rural eastern portion. Lakeland Communications would like to recommend to the Commission that it employ a split, as has been historically customary in Wisconsin, to alleviate the area code exhaustion in the 715 area code.

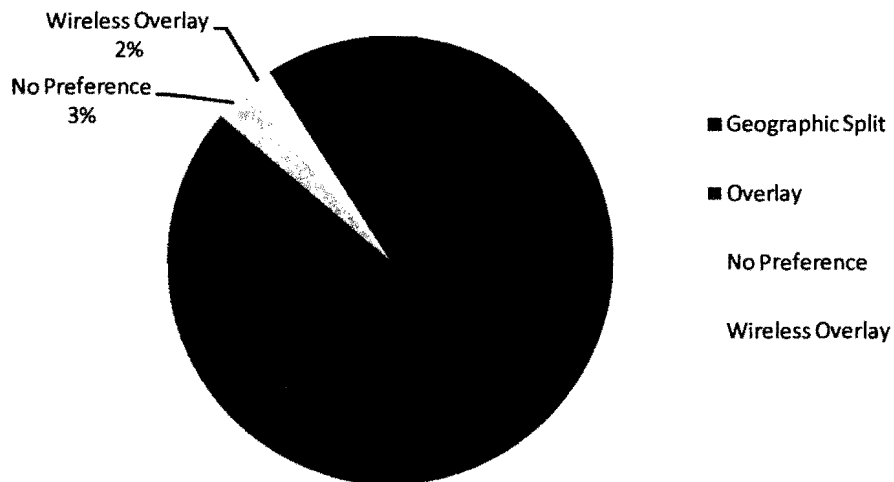
Industry Comments Received for the 715 and 920 Area Codes

NO.	CONTACT INFORMATION	SUPPORT SPLIT OR OVERLAY	COMMENTS
9	WE Energies 231 W. Michigan Street Milwaukee WI 53203	Overlay	We Energies is filing the following comments on the area code changes for the 715 and 920. We would prefer that the new area code for the 715 and 920 area be implemented using the overlay plan. The overlay method involves only NEW numbers being assigned the new area code while current numbers remain with the existing area code of 715 and 920. This does not require any extra work to implement on our part. With the geographic split plan, all current numbers that would fall into the new area code must be changed which would then require us to change all currently stored phone numbers that fall in the new area in our various applications. This would take some work to implement.
10	AT&T Wisconsin/AT&T Mobility	Overlay	See PSC REF # 85007.
11	TDS Telecommunications Corp. Jean Pauk 525 Junction Rd. Madison WI 53717	Overlay	See PSC REF #85000.
12	Sprint Spectrum/T-Mobile	Overlay	See PSC REF#84998.
13	Level 3 Communications	Overlay	See PSC REF #84903.
14	Powercom 1807 N Center Street Beaver Dam WI 53916	Overlay	The overlay is significantly less expensive to implement for consumers and for the Telecommunications industry. The geographic split absolutely has some positive attributes however, they do not outweigh the additional expenses involved to implement such a change. The programming involved for us as a CLEC to implement the overlay, is drastically less than that of the geographic split. The geographic split also inflicts considerable hardship on business customers who must change their phone number and everything that markets it to their customer base.

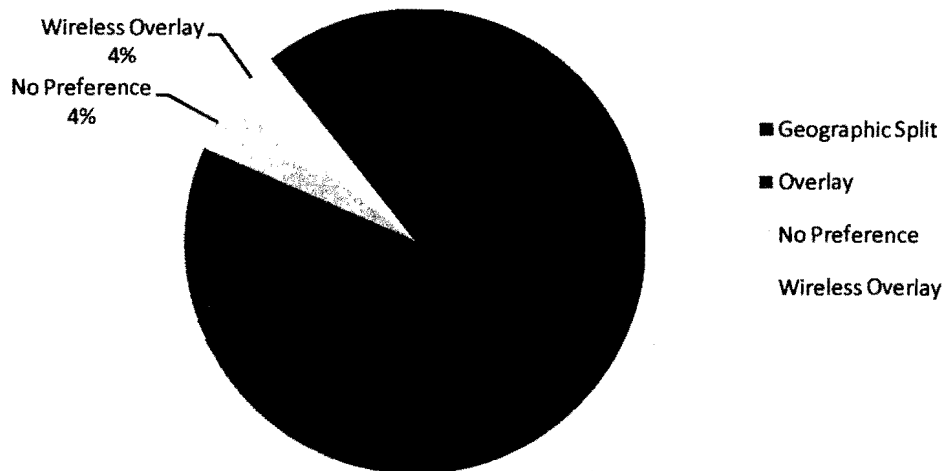
Total Comments Received for 920 (55 Comments Received)



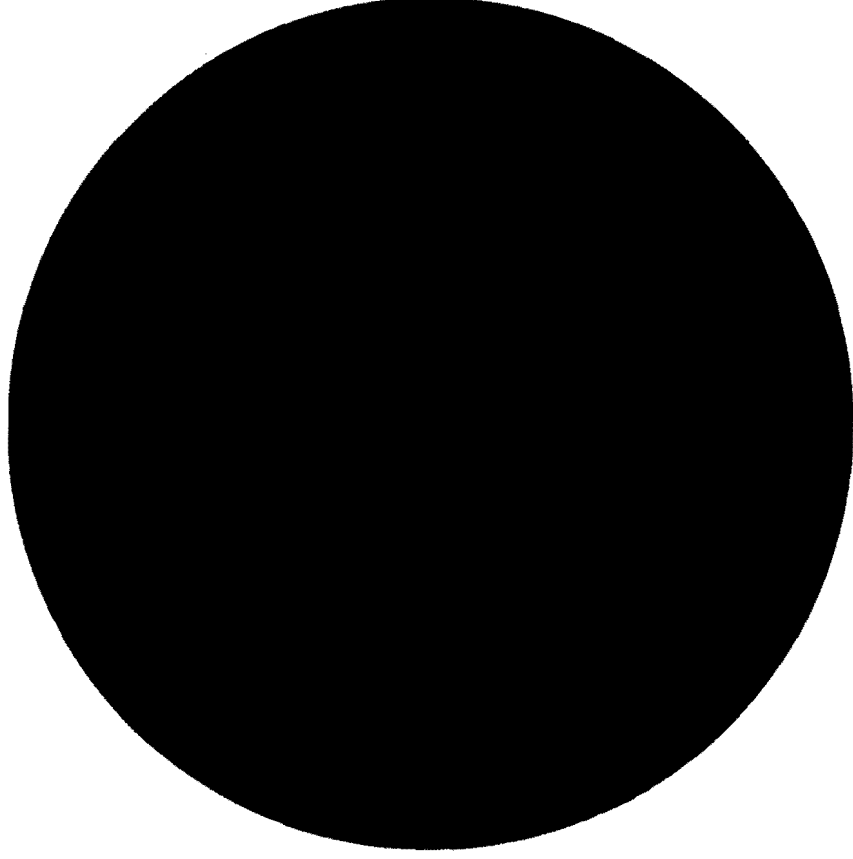
Total Comments Received for 715 (194 Comments Received)



Total of Comments Combined (249 Total Comments)



Industry Comments on 715 & 920



- Geographic Split
- Overlay